

**St. James
N.S.,
Cappagh,
Askeaton,
Co. Limerick**

**Telephone :(069)
64780
Email:
cappaghns1@yahoo.
ie**

**St. James' N.S.
Roll No. 09702H**



Privacy Notice (how we use pupil information)

By enrolling in and attending St. James' National School, you acknowledge that your personal data, (including special category personal data), will be processed by St. James' National School. The purpose of this Privacy Notice is to better inform you of

- ❖ the personal data we collect about you and your child
- ❖ why we use your personal data and how we collect it
- ❖ how we store your data and for how long
- ❖ who we share your personal data with and the reasons why we share it
- ❖ Your rights as a Data Subject – the person about whom we collect and store personal data

The categories of pupil information that we process include:

- ❖ personal identifiers and contacts (such as name, contact details, address, PPS number, images/photos, family details)
- ❖ characteristics (such as nationality, ethnicity, language, religion)
- ❖ safeguarding information (such as court orders and professional involvement)
- ❖ special educational needs (including the needs and allocated supports)
- ❖ medical and administration (such as doctor information, child health, dental health, allergies, medication and dietary requirements)
- ❖ attendance (such as days attended, number of absences, absence reasons and any previous schools attended)
- ❖ assessment and attainment (such as standardised test results, diagnostic tests, etc.)
- ❖ behavioural information (such as suspensions or expulsions)
- ❖ food choices (such as menu options for lunch on school tour)
- ❖ financial information (such as payments for books, tracksuits, visits, etc.)
- ❖ activities undertaken (such as external coaches)

This list is not exhaustive, to access the current list of categories of information we process please contact the school office.

Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- ❖ to process applications for enrolment
- ❖ to support pupil learning
- ❖ to monitor and report on pupil attainment progress
- ❖ to care for your child's health and wellbeing
- ❖ to coordinate, evaluate, fund and organize educational programmes
- ❖ to keep children safe (food allergies, or emergency contact details)
- ❖ to process grant applications and other funding
- ❖ to meet the statutory duties placed upon us for Department of Education data collections, including complying with legal obligations and monitoring and reporting procedures
- ❖ to process appeals, resolve disputes and defend litigation



Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are:

1. To prevent injury or other damage to the health of the data subject, or
2. To prevent serious loss or damage to the property of the data subject, or
3. To protect the vital interests of the data subject where the seeking of the consent of the data subject is likely to result in those interests being damaged, or
4. For the administration of justice, or
5. For the performance of a function conferred on by or under an enactment or,
6. For the performance of a function of the Government or a Minister of the Government, or
7. For the performance of any other function of a public nature performed in the public interest by a person, or
8. For the purpose of the legitimate interests pursued by a data controller except where the processing is unwarranted in any particular case by reason of prejudice to the fundamental rights and freedoms or legitimate interests of the data subject
9. The data subject has given explicit consent, or
10. The processing is carried out by a not-for-profit organisation in respect of its members or other persons in regular contact with the organisation, or
11. The processing is necessary for the purpose of obtaining legal advice, or in connection with legal proceedings, or is necessary for the purposes of establishing, exercising or defending legal rights, or
12. The processing is necessary for medical purposes, or
13. The processing is necessary in order to obtain information for use, subject to, and in accordance with, the Statistics Act, 1993, or
14. The processing is necessary in relation to the administration of a Social Welfare scheme

How we collect pupil information

We collect pupil information via enrolment forms, contact update forms, SEN assessment reports, files received from previous schools and online transfer files on the Primary Online Database (POD).

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

How we store pupil data

We hold pupil data securely for the set amount of time shown in our records retention schedule. For more information on our retention schedule and how we keep your data safe, please ask for a copy at the School Office.

Some personal data is only kept for a short period e.g. data no longer needed will be safely destroyed at the end of an academic year. Some data we retain for a longer period e.g. enrolment forms are retained in the school until your child reaches 25 years of age. Some data is never destroyed e.g. Roll Books and School Registers

Who we share pupil information with

We routinely share pupil information with:

- ❖ Schools that the pupils attend after leaving us
- ❖ Educational Welfare Services (EWS)
- ❖ National Council for Special Education (NCSE)
- ❖ Health Service Executive teams
- ❖ Tusla Child and Family Agency
- ❖ An Garda Siochana
- ❖ the Department for Education (DfE)
- ❖ the Department of Social Protection
- ❖ the Revenue Commissioners

The level of sharing and the nature of what is shared depend on various factors. The Government bodies to which we transfer your personal data will use your personal data for their own purposes (including: to verify other information they already hold about you, etc.) and they may aggregate it with other information they already hold about you and your family. We also share your personal data with other third parties including our insurance company and other service providers (IT providers, security providers, legal advisors etc.), We are legally required to provide certain records relating to the progress of a pupil (under 18 years) in his/her education to the pupil's parents/guardians, including results of assessments. We do not transfer your personal data to another country or international organisations. We do not engage in automated decision-making or profiling.

Why we regularly share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share information with primary schools that pupils transfer to via letter and online transfer via POD. The pupil's unique ID and contact information are shared.

We share information with secondary schools that pupils attend after leaving us via the Education Passport materials, including information provided by pupils, parents/carers and the teacher's end of year report. The data is transferred in paper format and hand delivered.

We have a statutory obligation under the Educational Welfare Act to provide information to Educational Welfare Services when individual children have missed more than 20 days of school each year. The data transferred includes name, address, date of birth, parent contacts and details of attendance records kept. We also provide statistical information about attendance across the school via a secure online portal.

We secure resources from the National Council for Special Education (NCSE) who allocate supports for children with SEN. The required forms usually request information including name, date of birth, category of need and details of supports needed by children to access learning. The data is shared in paper form and hand delivered. Parents/carers are required to sign consent for information to be

shared on each occasion for individual children. We also routinely provide information about SEN children who join or leave the school and the name of the school they moved to.

The HSE teams request contact information for children and their parents in order to make contact to complete health checks, e.g. vaccinations, vision and hearing tests and dental checks. The information requested includes name, date of birth, address and contact information for parents. This is provided in paper form and hand delivered or collected.

Under Child Protection and Safeguarding legislation, mandated persons are required to provide information regarding child protection referrals directly to Tusla. Where it does not pose a risk to the child, the parent will be informed of this referral in advance. The information provided includes name, address, date of birth, details of concern, details of parent contact details.

The Department of Education request statistical information on a regular basis, both collectively (e.g. number of children in the school, number of children who have English as an additional language, number of children accessing support teaching, etc.) and individually via the Pupil Online Database (POD) which assigns each pupil a unique identifier. This data is also used for research and statistical purposes and to confirm pupil's identify for capitation purposes (e.g. ensuring that each pupil in the state is counted once).

How the government uses your data

The pupil data that we lawfully share with the Department of Education through data collections:

- ❖ underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- ❖ informs 'short term' education policy monitoring and school accountability and intervention (for example, funding per capita, results of literacy/maths tests).
- ❖ supports 'longer term' research and monitoring of educational policy (for example allocation of teachers, SEN needs, etc.)

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the annual census) go to <https://www.education.ie/en/The-Department/Data-Protection/>.

Pupil Online Database (POD)

Much of the data about pupils in Ireland goes on to be held in the Pupil Online Database (POD). POD is managed by the Department for Education and contains information about pupils in schools in Ireland. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department.

It is held in electronic format for statistical purposes. This information is securely collected from schools via the secure Esinet portal. Data is shared with the Department of Employment Affairs and Social Protection for validation purposes, and with the Central Statistics Office under Section 31 of



the Statistical Act for statistical reporting and analysis. To find out more about POD, go to <https://www.education.ie/en/The-Department/Data-Protection/>.

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Principal via the school office.

You also have the right to:

- ❖ object to processing of personal data that is likely to cause, or is causing, damage or distress
- ❖ prevent processing for the purpose of direct marketing
- ❖ object to decisions being taken by automated means
- ❖ in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- ❖ a right to seek redress, either through the Data Commissioner, or through the courts

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Data Commissioner's Office at <https://www.dataprotection.ie/docs/complaints/1592.htm>

What does GDPR mean for Irish Primary schools?

The General Data Protection Regulation (GDPR) came into force on the 25th May 2018.

The following will apply to schools and their data as part of GDPR:

1. Personal data must be fairly and lawfully processed.
2. Accuracy - Personal data must be accurate and kept up to date.
3. Security - Personal data should be kept secure in terms of encryption and accessibility.
4. Keep data for no longer than is necessary.
5. Individuals rights - right of access to information, right to rectification.
6. Information is only shared with those who need it.

For more information visit www.aladdin.ie/content/dps_help

Some information on Aladdin

Aladdin and Google are Data Processors. The School is the Data Controller so the school have ownership of the data at all times. Aladdin is acting on our instruction to store it securely. All our data is stored exclusively in Google EU Data Centres.

Encryption of Information:



Aladdin use 128 bit SSL encryption on all data that is transferred between our school and Aladdin/Google. This means that even if we use Aladdin across an unsecured wireless connection our data is fully protected.

Security:

Access to the data is by username and password only and each account gives relevant access to their user i.e. the principal, secretary will see all students, whereas a classroom teacher will only see their class and a resource teacher just the children s/he is working with.

Aladdin is audited every day by McAfee site security. When we sign into Aladdin we see the 'secured by McAfee' logo giving us assurance that Aladdin has passed McAfee's intensive, daily security scan. Aladdin use https on sign in. Aladdin and Google's security systems are independently audited to international standards. (Aladdin is verified daily by McAfee site security and Google's data centre security is independently audited to SAS70 Type II, SSAE 16 Type II, and ISAE 3402 Type II standards.)

PRIVACY POLICY ALADDIN

Cloudware Limited t/a Aladdin Schools, with registered address at Aladdin, First Floor, Block 1, Deansgrange Business Park, Co. Dublin, Ireland (Aladdin) fully respects your right to privacy, and will not collect any personal information about you on this website without your clear consent.

Collection and use of your personal data

Any of your personal data which we collect will be treated with the highest standards of security and confidentiality, strictly in accordance with the General Data Protection Regulation (the "GDPR") and all applicable Data Protection Law. Such personal data will be used only for the purposes for which you have consented, and the purposes will be clearly set out at the point of collection.

Personal data will only be retained by Aladdin for as long as is necessary for the purpose for which it was collected.

Collection and use of technical information

Aladdin will make no attempt to personally identify individual visitors, or to associate the technical details listed below with any individual. It is the policy of Aladdin never to disclose such technical information in respect of individual website visitors to any third party, unless obliged to disclose such information by a rule of law. Technical details in connection with visits to this website are logged for our statistical purposes only. The technical details logged are confined to the following items:

- the visitor's IP address
- the top-level domain name used (for example .ie, .com, .org, .net)
- the previous website address from which the visitor reached us, including any search terms used
- clickstream data which shows the traffic of visitors around this web site (for example pages accessed and documents downloaded)
- the type of web browser used by the website visitor.

Your rights regarding data supplied to Aladdin

If you have supplied any personal data to Aladdin via the contact details provided on this website, you will have accrued certain rights including rights of access to, rectification, and erasure of such personal data. To exercise these rights, you must write to us at: Data Protection Manager, Aladdin,



Block 1, Deansgrange Business Park, Co. Dublin, Ireland. or e-mail us at dpm@aladdin.ie You should include any personal identifiers which you may have supplied (e.g. Name; address; phone number; e-mail address). Your request will be dealt with as soon as possible and will take no more than 30 days to process. If you are dissatisfied with any aspect of how Aladdin has collected or processed your personal data, or are dissatisfied with how Aladdin as managed your rights under Applicable Data Protection Law, you have a right to lodge a complaint with the Data Protection Commissioner.

Hyperlink to Third Party Websites

This Website contains hypertext links to websites not maintained by Aladdin. You are reminded that different terms and conditions of use will apply to you as a user of such websites. Such websites may not attain the same privacy standards as Aladdin.

GDPR & Aladdin

Aladdin is fully committed to helping and supporting our schools compliance with GDPR.

1) Expert Guidance

Aladdin has employed expert data protection guidance so schools can be assured their information is being held in a GDPR compliant environment

2) Access Management

Aladdin's access management options ensure that schools can share with staff only the information that is required of them.

3) Protection Levels

Sensitive documents on Aladdin can have advanced protection levels which can ensure only certain staff members have logged access to view/edit.

4) Subject Access Request

Individuals under the GDPR have the right of access, meaning they have a right to request access to the information a school holds on them or their students.

5) Ease of Access

Aladdin makes it easy to find up-to-date student/parent/class/ staff information. Reports and documents are all in one place and easy to access.

6) Accountability

Aladdin helps demonstrate compliance and reduces the need for schools to hold insecure paper records which are more susceptible to damage, loss, or theft.



7) Enhancing Security

Users are automatically logged out of Aladdin after a period of inactivity is detected. This policy is enforced in order to enhance data protection and security.

8) Further Info & Help

A fully comprehensive GDPR page is available from within Aladdin's help section. This provides a sample data protection policy and a sample school data protection self assessment form for schools to complete. As well as information on topics such as data breaches.

Contact

If you would like to discuss anything in this privacy notice, please contact the Principal

Implementation and review

This policy will be implemented fully from December 2020. The policy will be reviewed regularly, as required, in line with Department of Education Policy.

The school management team and the teachers will implement this policy.

The Board of Management ratified this policy on _____.

Chairperson

Date

Review Date: December 2023