

Scoil Náisiúnta Ghlinisce

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Glinsk,
Via Castlerea,
Co. Galway

Glinsk N.S.

Data Protection Privacy Statement for Parents, Guardians and Pupils

Effective from the 25th May 2018

Individuals have a number of rights in relation to their personal information – i.e. personal data – and these rights have been enhanced by the General Data Protection Regulation (GDPR). This Data Protection Statement describes how we at **Glinsk N.S.** collect and process personal data, in accordance with the GDPR and the school's legal obligations generally in relation to the provision of education. Processing is the legal term used to describe various acts including - the collection, recording, organisation, structuring, storage, alteration, use of, retrieval, disclosure or transmission of information.

This Statement applies to pupils, parents and guardians. By enrolling your child in and/or by attending **Glinsk N.S.** you acknowledge and agree to the collection and processing of personal information by the school.

For your information this Statement outlines:

- Who we are and how to contact us
- What information we collect, process and retain
- How information is collected and processed and the purpose and legal basis for so doing
- Sharing information with third parties
- Individual legal rights.

1. WHO WE ARE AND HOW TO CONTACT US

Glinsk N.S. is a data controller responsible for personal data - i.e. information relating to an identified or identifiable natural person. **Glinsk N.S.** processes personal data, i.e. the school collects, records, stores, retains and uses personal data. **Glinsk N.S.** will respond to your questions in relation to this data protection statement and our approach to privacy.

If you have any questions about this data protection statement, including any request to exercise your legal rights, please contact us using the details below:

glinsknschool@gmail.com

2. **INFORMATION COLLECTED**

Glinsk N.S. may collect the following personal information on pupils and parents/guardians:

(i) **Pupil Information**

- Personal details such as name, address, date of birth, gender, PPS number, nationality, emergency contact information and information in relation to the pupil's family as may be required,
- Any Special Education Needs (SEN),
- Any Child Protection information,
- Academic records, school reports, pupil learning needs, pupil behaviour needs, permission for access to educational reports, individual education and learning support plans,
- Personal pupil profiles (including whether English is the pupil's first language or if exempt from any subjects e.g. Irish or religion),
- Psychological referral/assessment documentation and permission for access to psychological reports,
- Information for the Primary Online Database (POD),
- Information for Special Educational Needs Organiser (SENO),
- Information for TUSLA (the Child and Family Agency) and/or the Health Service Executive (HSE),
- Attendance records and explanatory notes in relation to absences,
- Disciplinary records including notes that may be held by the teacher(s), incident and accident reports, investigations and sanctions if imposed,
- Permission notes in respect of school activities e.g. school tours/trips and outings, extra-curricular activities, (including Curricular, RSE/Stay Safe Programme(s)),
- Photographs and recorded images of pupil(s) (including at school events),
- School Transport information

(ii) **Sensitive Personal Information – Pupils**

Glinsk N.S. may collect and process the following special categories of more sensitive personal information such as:

- Information about pupil's health, medical certificates, medical needs, allergies and consent for administration of medicine,
- Religious belief and confirmation of engagement or not in Religious Sacraments,
- Membership of the Traveller Community,
- Racial or Ethnic origin.

(iii) **Parent / Guardian Information**

Glinsk N.S. may collect and process the following personal information from parents/guardians such as:

- Contact details of parent / guardian e.g. name, address, email address, telephone number(s)
- Information regarding legal orders in respect of any family law disputes in respect of guardianship, custody or access,
- Occupation and nationality,
- Number of children, position of pupil(s) in family,
- Consent in respect of medical/other emergencies,
- Consent in respect of school activities e.g. school tours/trips and outings, extra-curricular activities,

- Consent to publish photographs and schoolwork of pupils on school website / [Twitter account](#)/ print media etc,
- Records, correspondence or notes arising from interaction with Parents / Guardians,

Board of Management records maintained include:

- Name, address and contact details of each member of the Board of Management.
- Records in relation to appointments to the board.
- Minutes of board of management meetings.
- Financial statements/ audits and certification of accounts.
- Record of how funding from the DES is managed.
- Correspondence to the board.

The purpose for keeping Board of Management records include:

- A record of board appointments.
- A record of how legislative requirements are carried out.
- A record of staff appointments.
- Documenting decisions made by the board.
- A record of how enrolment to the school is managed.
- A record of the financial management of the school.
- A record of the development of the school.
- A record of how health and safety issues within the school are managed.
- A record of policy development within the school.
- A record of insurance cover and related issues.
- A record of capital development and building/grounds maintenance.
- Documentation relating to grievance and disciplinary procedures.

Absence Information

Online pupil absence notes are collected by e-mail through a Google absence form on the school website.

Purpose: The Education (Welfare) Act, 2000 requires parents to inform the school if their children will be absent from school on a school day and the reason for the absence. The Act also requires schools to report on school attendance. Schools are required to inform the Tusla Child and Family Agency's educational welfare services if a child is absent for more than 20 days in a school year.

Location: Annual Tusla school attendance records are stored in a locked filing cabinet that only authorised personnel who are authorised to use the data can have access to. Employees are required to maintain the confidentiality of any data to which they have access. Online returns on the Tusla portal are password protected.

Security: Paper records are kept in a secure filing cabinet in the school office. The online Tusla portal are accessed on a password protected PC.

Garda Vetting Information

All adults working with children in any capacity within the school must be Garda vetted. Completed vetting forms are sent to the Western Province Diocesan Vetting Service and the results of the vetting process are received by e-mail and are stored digitally in a Garda Vetting folder in the school e-mail account which is password protected. The results are also stored manually in a locked filing cabinet in the school office to which only authorised personnel may have access.

Teachers are vetted through the Teaching Council and the vetting outcome is available through the Digitory Core which is password controlled by each individual teacher.

Employees

Categories of data: Glinsk N.S. may hold some or all of the following information about Board of Management employees:

- Name
- Address
- Contact details
- Bank details
- P.P.S. number
- Amount paid

Purpose: This information is required for payment of weekly wages through Bright Pay software which is connected live to Revenue to ensure appropriate deductions are made.

Location: This information is stored in a locked filing cabinet that only authorised personnel who are authorised to use the data can have access to. Employees are required to maintain the confidentiality of any data to which they have access.

Security: Paper records are kept in a secure filing cabinet in the school office. Bright Pay software is on a password protected PC.

Online Payments

Categories of data: Glinsk N.S. will collect the following information through the payments section on the school website www.glinskns.ie

- Name
- Address
- Contact details
- Bank card details

Purpose: Online payments for school bills (i.e. book bills, pupil insurance scheme, voluntary contributions). Information sent to the school website is private & secure.

Location: This information is stored electronically on the school Stripe account & school payments e-mail account

Security: Paper records are kept in a secure filing cabinet in the school office. Computer records are kept on a password protected PC. The Stripe account is password protected and has a 2-step authentication process.

Contact Tracing

Categories of data: Glinsk N.S. will collect some or all of the following information

- Name
- Address
- Contact details
- Company details
- Time of entry/ exit

Purpose: This information is required for Covid-19 contact tracing by the H.S.E.

Location: This information is stored in a locked filing cabinet in the school office.

Security: Paper records are kept in a secure filing cabinet in the school office and will be shredded after a month, keeping records for a minimum amount of time.

Creditors

Categories of data: Glinsk N.S. may hold some or all of the following information about creditors:

- Name
- Address
- Contact details
- Bank details
- Amount Paid

Purpose: This information is required for routine management and administration of the school's financial affairs, including the payment of invoices, the compiling of annual financial accounts and comply with F.S.S.U. requirements for the annual submission of yearly accounts.

Location: This information is stored in a locked filing cabinet that only authorised personnel who are authorised to use the data can have access to. Employees are required to maintain the confidentiality of any data to which they have access.

Security: Paper records are kept in a secure filing cabinet in the school office. Computer records are kept on a password protected PC.

3. PURPOSE & LEGAL BASIS FOR COLLECTING & PROCESSING INFORMATION

Glinsk N.S. collects and processes personal information (as listed above) about pupils and parents / guardians for a variety of purposes and relies on a number of legal grounds to do so. **Glinsk N.S.** requires this information to perform our duties and responsibilities and to comply with our legal and statutory obligations. In addition, **Glinsk N.S.** requires this personal information to pursue the legitimate interests of the school and our dealings with relevant third parties (see below). The legitimate interests upon which we rely is the effective operation and management of **Glinsk N.S.** and managing the education and welfare needs of our pupils. **Glinsk N.S.** processes personal data on the basis of the following lawful purposes:

a) Legal Obligation

Glinsk N.S. collects and process personal information to comply with our legal and statutory obligations, including, but not limited to those under the Education Act 1998 (as Amended),

the Education (Welfare) Act 2000, the Education for Persons with Special Needs (EPSEN) Act 2004, the Health Act 1947, the Children First Act 2015, the Child Protection Procedures for Primary and Post-Primary Schools 2017, the Teaching Council Acts 2001-2015 and Safety Health and Welfare at Work legislation

b) Legitimate Interests

Glinsk N.S. may also process personal information to:

- Enable Pupils to develop to their full potential and meet the educational, social, physical and emotional requirements of the pupil,
- Enable Parents and Guardians to be contacted in the case of emergency, school closures and to inform Parents and Guardians of their child's educational progress,
- Secure and benefit from the support and services of relevant third parties.

c) Consent

Glinsk N.S. sometimes process some of pupils' personal information with consent e.g. photograph which may be displayed on the school's website or on social media platforms or in the print media. Please note that consent can be withdrawn at any time by contacting the school.

4. HOW PERSONAL INFORMATION IS COLLECTED

(i) Pupils

Glinsk N.S. collect personal information about pupils through the enrolment process and/or through expressions of interest in relation to enrolment. Additional information is collected from third parties, including former schools and through school activities and general interaction(s) during the course of the pupil's time at Glinsk N.S.

(ii) Parents and Guardians

Glinsk N.S. collect personal information about parents and guardians through the enrolment process or expressions of interest for enrolment. We collect additional personal information through general interaction during the course of the pupil's time at **Glinsk N.S.**

5. INFORMATION AND THIRD PARTIES

Glinsk N.S. may receive from, share and/or transfer information to a range of third parties such as the following:

- *The Department of Education and Skills*
- *H.S.E.*
- *TUSLA / the Child and Family Agency*
- *The National Council for Special Education*
- *National Educational Psychological Service (NEPS)*
- *Department of Social Protection and/or other state benefit providers*
- *An Garda Síochána*
- *School Insurance Provider*
- *Third Party Service Providers:* We may share personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT service providers including, printers, lawyers and other advisors, and providers of security and administrative services, including data processing / cloud storage service providers e.g. **[cloud storage service provider as relevant to school]**.

6. DATA RETENTION

We will only retain personal information for as long as it is necessary to fulfil the purposes the information was collected for, including any legal, accounting or reporting requirements.

7. TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EUROPEAN UNION

Glinsk N.S. may transfer the personal information we collect to countries outside the EU. Where there is no adequacy decision by the European Commission in respect of any such country that means that that country is deemed not to provide an adequate level of protection for your data. However, to ensure personal information does receive an adequate level of protection we will in such circumstances put in place appropriate measures such as the use of model contractual clauses as approved by the European Commission to ensure personal information is treated by those third parties in ways that are consistent with respect to EU and Irish Laws on Data Protection.

8. INDIVIDUAL RIGHTS

Individuals have several rights under GDPR which in certain circumstances are limited and/or constrained. These individual rights include the right – free of charge and subject to any limitations as may apply – to:

1. Request a copy of the personal information held about the individual.
2. Rectify any inaccurate personal data held about the individual.
3. Erase personal information held about the individual.
4. Restrict the processing of individual personal information.
5. Object to the use of individual personal information for our legitimate interests.
6. Receive individual personal information in a structured commonly used and machine-readable format and to have that data transmitted to another data controller.

If you wish to exercise any of these rights, please contact us at the school at glinkschool@gmail.com

Glinsk N.S. will endeavour to respond to your request within a month. If we are unable to deal with your request within a month, we may extend this period by a further two months and we will explain why.

You also have the right to lodge a complaint to the office of the Data Protection Commission.

9. IMPLEMENTATION OR ROLES AND RESPONSIBILITIES

In our school the Board of Management is the data controller and the Principal will be assigned the role of co-ordinating implementation of this Data Protection Policy, and for ensuring that staff who handle or have access to Personal Data are familiar with their data protection responsibilities. The following personnel have responsibility for implementing the Data Protection Policy:

Name	Responsibility
Board of Management	Data Controller
Principal	Implementation of Policy
Teaching Personnel	Awareness of responsibilities
Administrative Personnel	Security & confidentiality
I.T. Personnel	Security, encryption, confidentiality

10. UPDATES

We will update this data protection statement from time to time. Any updates will be made available and, where appropriate notified to you. Parents/guardians will be informed of the Data Protection Policy at the time of enrolment of pupils by inclusion of a statement (see Appendix 1). This policy will be available via the school's website.

This Data Protection Policy has been updated and reviewed by the Board of Management of Glinsk N.S.

on the 10th of November 2020

Signed: _____

Chairperson B.O.M.

Date: _____

Appendix 1

Data Protection Statement for inclusion on relevant forms when personal information is being requested.

The information collected on this form will be held by Glinsk N.S. in manual and in electronic format. The information will be processed in accordance with the Data Protection Act, 1988 and the Data Protection (Amendment) Act, 2003.

The purpose of holding this information is for administration needs and to facilitate the school in meeting the student's educational needs and legal commitments etc.

Disclosure of any of this information to statutory bodies such as the Department of Education and Skills or its agencies will take place only in accordance with legislation or regulatory requirements.

Explicit consent will be sought from Parents/Guardians if the school wishes to disclose this information to a third party for any other reason.

Parents/Guardians of students and students aged 18 or over have a right to access the personal data held on them by the school and to correct it if necessary.

I consent to the use of the information supplied as described.

Signed Parent/Guardian: _____