

St. Louise de Marillac Primary School



Data Protection Privacy Statement for Parents, Guardians, Pupils & Staff

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 St. Louise de Marillac Primary School 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 St. Louise de Marillac Primary School 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

St. Louise de Marillac Primary School is a data controller responsible for personal data - i.e. information relating to an identified or identifiable natural person. St. Louise de Marillac Primary School processes personal data, i.e. the school collects, records, stores, retains and uses personal data. St. Louise de Marillac Primary School 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 following details: **admin@stlouisesprimaryschool.ie**.

2. INFORMATION COLLECTED

St. Louise de Marillac Primary School 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, preschool reports, pupil learning needs, pupil behaviour needs, permission for access to educational reports, pupil 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),
- CCTV footage and other information obtained through electronic means

(ii) Sensitive Personal Information – Pupils

St. Louise de Marillac Primary School 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

St. Louise de Marillac Primary School 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 / print media etc.
- Records, correspondence or notes arising from interaction with Parents / Guardians

(iv) Staff Information

St. Louise de Marillac Primary School may collect and process the following personal information from staff members such as:

- Contact details of staff member e.g. name, address, email address, telephone number(s)
- Details of next of kin in case of an emergency
- Contract details
- Teaching council numbers
- Garda Vetting declarations
- PPS numbers and bank account details
- Attendance records – record of illness (sick certificates, doctor's notes etc.)
- Application forms for maternity / paternity leave, parental leave, unpaid leave
- Certificate for CPD courses

3. PURPOSE & LEGAL BASIS FOR COLLECTING & PROCESSING INFORMATION

St. Louise de Marillac Primary School 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. St. Louise de Marillac Primary School requires this information to perform our duties and responsibilities and to comply with our legal and statutory obligations. In addition, St. Louise de Marillac Primary School 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 are the effective operation and management of St. Louise de Marillac Primary School and managing the education and welfare needs of our pupils. St. Louise de Marillac Primary School processes personal data on the basis of the following lawful purposes:

a) Legal Obligation

St. Louise de Marillac Primary School 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 (Revised 2023), the Teaching Council Acts 2001-2015, Safety Health and Welfare at Work legislation and Admissions Policy.

Certain pupil data may be shared with the HSE for the purpose of the School Health Programme. The legal basis for this is:

- GDPR Article 6: — processing is necessary for compliance with a legal obligation to which the controller is subject;
- GDPR Article 9: — processing is necessary for the purposes of preventive medicine, medical diagnosis, the provision of health treatment or the management of health systems and services on the basis of law; and processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health on the basis of law.
- Infectious Diseases (Amendment) (No. 2) Regulations 2024;
- Health (Provision of Information for Health Examination and Treatment Service) Regulations 2024

b) Legitimate Interests

St. Louise de Marillac Primary School 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

St. Louise de Marillac Primary School 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. Once parental consent has been given to engage in a digital platform i.e. Seesaw / Zoom, then there is an understanding that a pupil's work may be shared with the pupil's consent. Please note that parents can withdraw their consent at any time by contacting the school.

4. HOW PERSONAL INFORMATION IS COLLECTED

(i) Pupils

St. Louise de Marillac Primary School collects 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 St. Louise de Marillac Primary School.

(ii) Parents and Guardians

St. Louise de Marillac Primary School collects 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 St. Louise de Marillac Primary School.

5. INFORMATION AND THIRD PARTIES

St. Louise de Marillac Primary School may receive from, share and/or transfer information to a range of third parties including but not limited to:

- *The Department of Education and Skills*
- *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*
- *Psychologists/Play therapists*
- *Familibase Speech & Language Therapist*
- *School Completion Programme*
- *HSE - certain pupil data may be shared with the HSE for the purpose of the School Health Programme*
- *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. Aladdin, Dev Tech and our school's IT consultant.

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. See Appendix A for more details.

7. TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EUROPEAN UNION

St. Louise de Marillac Primary School 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 as outlined – email admin@stlouisesprimaryschool.ie. Use the title GDPR in the subject box with all data protection queries.

St. Louise's School has an agreed systematic cycle of review of policies whereby new policies are reviewed after one year and thereafter every three years unless an earlier review is requested for a specific reason by a member of the school community if circumstances arise that would prompt a more timely review.

This policy was reviewed and ratified by the Board of Management of St. Louise de Marillac Primary School on 11th February 2025.

It is available for parents and staff online on the school website. It is also available in the policy folder in staffroom and school office.

Chairperson's Signature:



Date: 11/2/2025



St. Louise de Marillac Primary School
Data Protection Privacy Statement Appendix A

Details of the records that are kept

The table outlines where and why the records are kept. It also details for how long they are kept and who has access to them.

| Record | Where? | For what purpose? | For how long? | Who has access? | Updated? When? |
|--|---|--|--|---|-----------------------------|
| 1) Annual pupil end of year reports | The original is given to the parents / guardians. Since 2011 electronic copies are stored on Aladdin management system Hard copies of previous years are stored in the Store Room. | Legal reasons Teacher information | For 10 years after the child leaves school, or until a pupil would have reached the age of 21, whichever is greater. | Parents/ legal guardians Duplicate hard copy available on request through office/SET co-ordinator. E-copy is password-protected; access to Aladdin by administrators. Reports of 6 th class pupils are given to post-primary schools since 2013/14. | Every June by class teacher |
| 2) Standardised tests (Record of results only) | Support Rooms & Classrooms. Since 2011 electronic copies are stored on Aladdin management system. Standardised test papers will be maintained for 1 year and destroyed following the completion of the test the following year. | Legal reasons Teacher information and planning purposes | For 10 years after the child leaves school, or until a pupil would have reached the age of 21, whichever is greater. | Principal, Parents/ legal guardians, class teachers, SEN team, NEPS, Inspectorate Results are given to post-primary schools since 2013. Aggregated results to DES annually | Every May/June |
| 3) Teacher-designed tests / | Copies of some are kept in class and | Teachers information Pupil progress | Until end of school year. May be passed | Teachers Parents/ legal guardians | Regularly as required |

| Pupil Learning Plans | support teacher's filing cabinet or folder. | Supplementary teaching | on to next teacher. | DES inspectorate | |
|--|---|---|---|--|---|
| 4) Diagnostic Tests | Results in support teacher's room while working with child. | Planning | To be passed on to next SET teacher at start of next school year | Teachers Parents / legal guardians NEPS | Annually and as deemed necessary |
| 5) Samples of Pupils' Work / Pupil Progress Reports | In classrooms/support rooms. Some may be passed onto next teacher / sent home. | Pupil progress | Perhaps until end of school year. May be passed on to next teacher. | Teachers and parents / legal guardians | N/A |
| 6) Support Plans & Pupil Support Files Referred to as Individual Education Plans (IEPs) until 2018 | Support teacher's rooms Classroom Issued to Parents SNAs Electronic copy on server | Legal Teacher information | Never destroy | Education Welfare; Health Board; Past pupils Parents/guardians 2nd level schools if consent from parents is given | Every October and February at SSP (IEP) meetings. |
| 7) Psychological Assessment, Speech & Language Therapy, Medical and professional reports | Principal's office Rooms of S.E.N. team, Class teacher Archived when pupil has left school | To keep record of child's conditions / results and ensure they were given allocated resource hours etc. | Never destroy | Teacher SET Principals Parents/Guardians 2nd level schools if consent granted from parents | Not updated by school |
| 8) SEN Referral Letters and Consent Forms | Principal's and Secretary's Offices | Access to services of outside agencies and professionals | Until child leaves the school. | Secretary/Principal Special Education Team | As necessary |
| 9a) Pupil contact details / Roll Book / Electronic Record Keeping | In every classroom. Since 2011 electronic copies are stored on Aladdin management system. | Proof of child's attendance; school's statistics | Up until child's 18 th birthday, plus 6 years | Parents/guardians Teachers School secretary School Completion Programme (SCP) personnel May be requested legally | Daily |

| | | | | | | |
|---|--|---|-----------------|--|--|---|
| System (currently Aladdin) | Archiving of old books | School Tracking attendances Pupil data | Numbers average | Indefinitely as part of school archive | Principal School inspector | |
| 9b) Leabhar Tinrimh Register (Clárleabhar) | Principal's Office Archiving of old books | Proof of child's attendance | | Stored electronically on Aladdin. | Requested legally Principal, Chairperson of BOM School Secretary School inspector EWO | |
| 9c) NEWB Reports | Secretary's Office Class teacher – 1 year Pass on absence notes & sick notes for children reported to NEWB to office | | | | Principal Secretary SCP personnel HSCL teacher Submitted to NEWB bi-annually as requested. | On request |
| 10) Exemption from Irish Language learning | Principal's office | To exempt certain pupils from the learning of Irish as per DES Circular | | For 10 years after the child leaves school, or until a pupil would have reached the age of 21, whichever is greater. | Principal Parents/ legal guardians Teachers DES Post-primary school | N/A |
| 11) Learning Support Refusal | School office in pupil file | To keep a record of such refusal by parent(s) | | For 10 years after the child leaves school, or until a pupil would have reached the age of 21 whichever is greater. | Principal Parents/ Legal Guardians Teachers | |
| 12) Enrolment Form | Pertinent details uploaded to Aladdin management system; Secretary's Office | Background info on child; permission for testing, internet use, trips; acceptance of Code of Behaviour etc. | | For 10 years after the child leaves school, or until a pupil would have reached the age of 21 whichever is greater. | Principal School secretary Teachers | When need arises e.g. new contact details |
| 13) Record of child's breaches of Code of Behaviour / | Classroom teacher's file for the current school year | To keep a record of serious behavioural incidents To inform parents | | Never destroy | Teachers Parents/ Legal Guardians NEWB Board of Management | As incidents occur |

| Suspension / Expulsion | Principal's Office (for serious breaches) | Legal reasons | | Solicitors on request | |
|--|--|--|---|--|--------------------|
| 14) Records of any serious injury/accident | First aid record/yard book (minor incidents) Principal's office (serious accidents) | To indemnify school for insurance purposes; To inform parents | Never destroy | Teachers Parents/ Legal Guardians Solicitors on request | As incidents occur |
| 15) Child Protection Referrals to HSE by Designated Liaison Person (DLP) | Principal's office | Legal reasons Child safety | Never destroy | Principal (DLP) Deputy Principal (Deputy DLP) Tusla personnel (Social workers) Parents/ Legal Guardians (if deemed appropriate) | As incidents occur |
| 16) Request by parents / guardians for child to leave school early | At reception desk | Legal reasons Child safety | For one year | Teachers Parents/ Legal Guardians Secretary | Daily |
| 17) Indemnity form for administration of medication | Forms – Principal's office, School Office & BOM file Highlighting medical condition in staffroom if appropriate Photo of pupil with serious medical conditions in staffroom & at First Aid Station | So teachers are aware of children's medical conditions, allergies; permission to staff to administer medication if necessary | For 10 years after the child leaves school, or until a pupil would have reached the age of 21 whichever is greater. | Teachers BOM SNAs Sub Teachers | As the need arises |
| 18) Legal orders re: Access | School office (pupil's file) | To inform school personnel, e.g. in case of request for early dismissal of a child; To protect children | For 10 years after the child leaves school, or until a pupil would have reached the age of 21 whichever is greater | Communicated on a need to know basis to relevant staff (communicated through the principal) | As the need arises |
| 19) Copies of | School office (pupil's | To verify date of birth | While child is in school | School secretary | |

| | | | | | |
|--|--|--|--|--|--|
| Birth Certificates | file) | for enrolment, testing | | Principal & Teachers | N/A |
| 20) Copies of Baptismal certificates | School office (pupil's file) | Requested by parish priest prior to Catholic children receiving sacraments of penance / communion / confirmation | While child is in school | Parish priest/school chaplain Teachers of 2nd and 6 th class School secretary | N/A |
| 21) Employee's data (contract of employment, Teaching Council registration, vetting records) | Personnel file in Secretary's office | For employment legislation; Contracts | Retention for duration of employment and 7 years. | Employees BOM through necessary School secretary | When necessary e.g. when employment situation changes, incidents arise |
| 22) Accident / injury at work reports | Principal's Office Personnel file in secretary's office | Legal reasons Health & safety | 6 years to make a claim against the school plus 1 year for proceedings to be served on the school. | Employees BOM through necessary School secretary School Insurers | As arises |
| 23) BOM Records | | To be accountable to BOM, Patron, Department, Inspectorate, Teachers | | | |
| School financial accounts | Principal's Office Secretary's Office Store room | | 7 years | BOM Archbishop's House (Diocesan office) Accountant for certification | On a monthly basis |
| Agenda minutes | Principal's Office (secured on the school server) | | Indefinitely | | After each BOM meeting |
| Payroll & taxation | | | 6 year period after end of the tax year | | |

Guidelines for Administration of Records

Note: Annual School Reports are circulated to parents through Aladdin Connect. Any parents who do not use Aladdin Connect receive a physical copy of the report at the end of June. A copy of the report will be mailed to any parent who is legally entitled to it on request. Currently, the standard format used is the recommended NCCA Report for all pupils. Standardised test scores are recorded as are details of supplementary teaching and yearly attendance figures. The digital report is signed electronically by the class teacher and the Principal. The report is stored electronically.



Appendix B

Procedure to be followed in the event of a data breach e.g. a group email being sent to all parents where all recipients' email addresses are visible.

1. Staff member to inform the principal / deputy principal as soon as possible.
2. Staff member to complete Appendix B.
3. Principal / Deputy Principal to inform the Data Controller (BoM) within 72 hours of becoming aware of the breach.
4. Data Controller contacts the Data Protection Commissioner.

Staff Member's Name: _____

Reporting Date: _____

Brief details of data breach:

Date the breach occurred: _____

Signed: _____

Principal / Deputy Principal's Signature: _____

