

Appendix I

Data Privacy Statement

Privacy Notice to Students and their Parents/Guardians St. Patrick's Classical School, Navan, Co. Meath.

By enrolling in and attending St. Patrick's Classical School, Navan you acknowledge that your personal data (including special category personal data) shall be processed by St. Patrick's Classical School, Navan.

This Privacy Notice gives you some helpful information about who we are, what personal data we collect about you, why, who we share it with and why, how long we keep it, and your rights.

If you need more information, please see our Data Protection Policy available on our website.

I. Who we are:

We are St. Patrick's Classical School, Navan Co. Meath. Our address and contact details are St. Patrick's Classical School, Moatlands, Navan, Co. Meath. (046-9023772).

We provide second level education in the voluntary school sector. For further information, see our Data Protection Policy available on our website www.stpatscs.com

2. The information we collect about you

When you are a student with St. Patrick's Classical School, we collect and use your personal data.

The personal data we collect can include information about your identity and contact details; images/photo (including CCTV); family details; admission/enrolment details; previous schools; academic progress; PPS number; special educational needs; nationality; ethnicity; language; religion; medical data; information about behaviour and attendance; information about health, safety and welfare; financial information (re fees, grants, scholarships etc.); and other personal data.

Further details of the data we collect please refer to our Data Protection Policy. If you are under 18 years when you enrol, we collect the name, address, contact details and other information about your parents/guardians. If you are under 18 years, your parent/guardian will be consulted and asked to give consent for certain things like taking your photograph, going on school trips etc.

3. How we use your information and the legal basis

We use your personal data for purposes including:

- *your application for enrolment;*
- *to provide you with appropriate education and support;*
- *to monitor your academic progress;*
- *to care for your health and well-being;*
- *to care for our staff and students;*
- *to process grant applications, fees and scholarships;*
- *to coordinate, evaluate, fund and organise educational programmes;*
- *to comply with our legal obligations as an education body;*
- *to comply with our monitoring and reporting obligations to Government bodies,*
- *to process appeals, resolve disputes, and defend litigation etc.*

For further information on what data we collect, why we collect it, how we use it and the legal basis for same, please refer to our Data Protection Policy.

4. Who we share your information with

We share your personal data with third parties, including other Government bodies.

This includes the State Examinations Commission, the Department of Education and Skills, NCSE, TUSLA, NEPS, An Garda Síochána, HSE, the Department of Social Protection, the Revenue Commissioners etc.

We also share your information with Advanced Learning who service our attendance and results reporting software and Artifact IT who manage our ICT software and hardware and as a result have indirect access to electronic data. We have a Third Party Service Agreements with both of these companies.

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 (Facility Messaging, Easy Payments Plus, security providers, legal advisors etc.), We are legally required to provide certain records relating to the progress of a student (under 18 years) in his/her education to the student's parents/guardians, including results of examinations. For further information on who we share your data with, when and in what circumstances, and why, please see our Data Protection Policy.

HSE:

Certain pupil data may be shared with the HSE for the purpose of the School Health Programme

In the section covering the legal basis for processing:

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.

Junior Cycle Profile of Achievement Award

For the information of parents/guardians of students who receive Junior Cycle Profile of Achievement (JCPA) award Introduction. It is required by data protection law that before schools commence processing of any personal data a school must first bring a privacy notice on how the student's personal data will be processed to the attention of parents/guardians.

This privacy notice relates to those students who have undertaken Junior Cycle at Level 3, Level 2 or Level 1 of the National Qualifications Framework. Junior Cycle Level 3 includes exams set by the State Examinations Commission (SEC), where the provisional results are provided to schools and students in the September following the sitting of the State examinations. Junior Cycle Level 2 and Level 1 Learning Programmes are designed for students with particular special educational needs and is broadly aligned to Level 2 and 1 of the National Framework for Qualifications (NFQ) respectively. In some instances students will undertake a combination of a Level 1, 2 and Level 3 programme.

The information in relation to how students' Junior Cycle assessment data will be used to produce the Junior Cycle Profile of Achievement (JCPA). The JCPA has replaced the Junior Certificate award. Where student details are currently maintained on the Department's Post-Primary Online Database (PPOD) the JCPA will be produced by schools via PPOD. Where student details are not held on PPOD (e.g. special schools) the JCPA will be produced via the Junior Cycle Assessment Database (JCAD3).

Schools will be enabled to record additional assessment student data on PPOD or JCAD for the purpose of producing a Junior Cycle Profile of Achievement (JCPA) for each of their students who completes the Junior Cycle.

This approach enables

- a. schools to record on PPOD or JCAD the descriptors awarded in Classroom Based Assessments in subjects and short courses and also reflect achievement in Priority Learning Units (PLUs) for students with special educational needs.
- b. the State Examinations Commission (SEC) to provide state examinations final results electronically to the Department of Education and Skills for upload to PPOD and JCAD and association of these results with each student.
- c. the Department of Education to provide the JCPAs electronically to schools/centres of education for each student.
- d. Schools/centres of education to complete the 'other areas of learning' section of the JCPA for each student and deliver the award to students. The 'other areas of learning' section of the JCPA allows the school/centre of education to report on other learning experiences and events that the student has participated in outside

Please see separate Privacy Notice on general use of P-POD at <https://www.gov.ie/en/service/43ddb5-post-primary-online-database-p-pod/>

JCAD is the DE database developed to facilitate the production by Special Schools and Centres of Education of the JCPA. Page 22 the formal timetabled curriculum. The data entered at school level for 'other areas of learning' will not be stored on the Department's database.

e. following production of the JCPA for each student the school/centre of education to retain a copy of the full JCPA for each student. The Department will retain a copy of a draft version of the JCPAs for 7 years after the age of majority (18).

f. the data to be anonymised once JCPAs are produced and used in statistical analysis. No identifiable individual data is used by the Department except to provide, on request, draft copies of the JCPA to schools.

It should be noted that only a small number of staff within the Department of Education has access to the personal data and then solely to provide technical support to your school/centre of education when it is using the PPOD or JCAD application. Student data as set out below will not be shared with anyone else other than another post-primary school in which the student enrolls.

Pursuant to Section 3 and Section 4 of the Data Protection Acts, you may access your personal data and request a copy of your data held on PPOD by contacting your school, or if you are a former student by contacting the Department of Education. Under data protection law you may object to the processing of your data or seek to have the data corrected. More detail on use of personal data by the Department is contained in the FAQ on PPOD available on <https://www.education.ie/en/The-Department/Data-Protection/FAQ.html>.

The Department of Education Data Controller for PPOD is the Principal Officer in the Schools Section within the Department who can be contacted by e-mailing ppodhelpdesk@education.gov.ie

The Data Protection Officer for the Department may be contacted by e-mailing dpo@education.gov.ie

List of post-primary student personal data⁴ recorded by post-primary schools on PPOD or JCAD for the purpose of producing the Junior Cycle Profile of Achievement (JCPA). Sensitive Personal Data for some students with a special education need

- Priority Learning Unit descriptor
- Priority Learning Unit medium – Irish/English
- Priority Learning Unit outcome Written consent should be sought from the parents/guardians of students with special educational needs (see template below). For each subject where an examination held by the State Examinations Commission was taken
- Level taken in the final examination
- Outcome of Classroom-Based Assessments 1 and 25 (NB only if recorded on PPOD)
- Predicted medium through which final examination taken Irish/English • Overall grade awarded by State Examinations Commission
- Annotation of result to indicate a subject was assessed except for a particular element e.g. aural is missing.

For each short course taken • Title • Level of Learning Programme - 2 or 3 • Medium Irish/English

• Outcome of Classroom- Based Assessment In addition the following data provide by the State Examinations Commission will be printed on your JCPA

- Forename and Surname – as provided to the State Examination Commission
 - Date of Birth – to aid identification whether there are more than two students with the same name
 - State examination candidate number – to assist with any follow up query with State Examinations
- Information on other personal data stored outside of PPOD and used by your school in producing your JCPA is available in your school's Data Protection Policy a copy of which may be obtained from your school. Information on the all other personal data of students collected and processed by schools using PPOD is available in the Fair Processing Note for PPOD copies of which are available at www.gov.ie

5. We do not transfer your personal data to a third country or international organisation.

6. We do not engage in automated decision making/profiling.

7. How long we hold your data

Some personal data is only kept for a short period (e.g. we will destroy at the end of an academic year because it is no longer needed). Some data we retain for a longer period (e.g. retained after you leave or otherwise finish your studies in St Patrick's Classical School). These are based on statutory guidelines. Details of the retention the retention periods are detailed in our Data Retention Policy.

8. You have the following statutory rights that can be exercised at any time:

- Right to complain to supervisory authority.
- Right of access.
- Right to rectification.
- Right to be forgotten.
- Right to restrict processing.
- Right to data portability.
- Right to object and automated decision making/profiling.

9. Subject Access Requests

The General Data Protection Regulation states that individuals have a right to obtain:

- Confirmation that their data is being processed, access to their personal data and the following information.
 - The purpose of the processing
 - The categories of personal data
 - Recipients of the data
 - Source of the data
 - Period of storage
 - International transfers

Data subjects are entitled to a copy of their personal data on written request, email is also sufficient.

- The school hold the right to confirm the identity of the individual making the Subject Access Request. If the school is not satisfied with the identification of the individual making the request, the school will ask the individual to provide more information, such as a date of birth, a passport or a birth certificate. The school also has the right to refuse a Subject Access Request if the individual fails to provide identification.

- The timescale for compliance with Subject Access Requests is one month. This period may be extended by a further two months where requests are complex or numerous.
- Individuals will not be charged a fee for the provision of copies of records. However, the General Data Protection Regulation outlines that a “reasonable fee” may be charged when a request is “manifestly unfounded or excessive”, particularly if it is repetitive.
- If a Subject Access Request is made electronically, the information will be provided in a commonly used electronic format, unless otherwise specified.
- If the school declines to comply with a Subject Access Request, on the grounds that the request is “manifestly unfounded or excessive”, then the patient must be provided with a reason and be informed of their right to make a complaint to the Data Protection Commission.

Please note that if the information you request reveals details directly or indirectly about another person, which the other person may regard as private, we will have to seek the consent of that person if they are ages 16 and above before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

10. Contact

If you would like to discuss anything in this privacy notice, please contact the schools Data Protection Officer at office@stpatcs.com

Personal Data Consent Form

(These forms are shared via the School App, Unique Schools)

St. Patrick's Classical School is a data controller under the General Data Protection Regulation and the Data Protection Act 2018. The personal data of you and your child as supplied by you is retained for the purposes of:

- student enrolment
- student registration
- allocation of teachers and resources to the school
- determining a student's eligibility for additional learning supports
- examinations
- school administration
- child welfare (including medical welfare)
- to fulfil our other legal obligations.

School Contacting You

Please confirm that you are happy for us to contact you by SMS/text message, App Notifications and to call you on the telephone numbers provided and to send you letters / emails for all the purposes of:

- sports days
- parent teacher meetings
- school concerts/events
- to notify you of school closure (e.g. when there are adverse weather conditions)
- to notify you of your child's non-attendance or late attendance or any other issues relating to your child's conduct in school
- to communicate with you in relation to your child's social, emotional and educational progress and to contact you in the case of an emergency
- in exceptional circumstances.

Tick box if "yes" you agree with these uses

Use your home/email address to alert you to these issues?

Use your mobile phone number to send you SMS texts / App notifications to alert you to these issues?

Use your mobile phone/landline number to call you to alert you to these issues?

Please note: St. Patrick's Classical School reserves the right to contact you in case of an emergency relating to your child, regardless of whether you have given your consent.

While the information provided will generally be treated as private to St. Patrick's Classical School and will be collected and used in compliance with the General Data Protection Regulation and the Data Protection Act 2018, from time to time it may be necessary for us to transfer your personal data on a private basis to other bodies (including the Department of Education & Skills, the Department of Social Protection, An Garda Síochána, the Health Service Executive, Tusla (CFA), social workers or medical practitioners, the National Educational Welfare Board, the National Council for Special Education, any Special Education Needs Organiser, the National Educational Psychological Service, or (where the student is transferring) to another school). We rely on parents/guardians and students to provide us with accurate and complete information and to update us in relation to any change in the information provided. Should you wish to update or access your/your child's personal data, you should write to the school principal.

Data Protection Policy: A copy of the full Data Protection Policy is shown on our school website.

Photographs of Students:

The school maintains a database of photographs of school events held over years. It has become customary to take photos of students engaged in activities and events in the interest of creating a pictorial as well as historical record of life at the school. Photographs may be published on our school website or in brochures, yearbooks, newsletters, local and national newspapers and similar school-related productions. In the case of website photographs, student names will not appear on the website as a caption to the picture. If you or your child wish to have his photograph removed from the school website, brochure, yearbooks, newsletters etc. at any time, you should write to the school principal.

Consent (tick one only)

1. If you are happy to have your child's photograph taken as part of school activities and included in all such records, tick here

2. If you would prefer not to have your child's photograph taken and included in such records, please tick here

3. If you are happy for your child's photograph to be taken and included, as 1. above, but would prefer not to have images of your child appear on the school website, in school brochures, yearbooks, newsletters etc., please tick here.

Signed:

Student Name:

Class Group (2018/2019):

Date:

A copy of the school's Data Protection Policy is available on our website www.stpatscs.com or from the school office.

Policy Ratification

This policy was first ratified by the Board of Management at its meeting on the 7th of March 2019.

This policy reviewed and ratified by the Board of Management every three years:

The Board of Management approved and ratified the School Policy on the 08-02-2025.

Signed



Signed:



Fr. Gerry Stuart

Chairperson of Board of Management

Date: 08-02-2025

Mr. Harry Mc Garry

Principal/Secretary to the Board of Management

Date: 08-02-2025