Information for Parents on the New Primary Online Database (POD)

Why has the Department introduced POD?

There are already databases in place covering pre-primary, post-primary, PLC and third level education, and the lack of individualised information on primary school pupils presents a very significant data gap for monitoring the progress of pupils from primary to secondary level. Therefore the Department has developed an electronic individualised database of primary school pupils, called the Primary Online Database (POD).

The purpose of POD is to monitor the progress of children through the education system in order to ensure that everyone can meet his or her educational potential, and also to ensure that every child of compulsory school age is in receipt of an education. POD data will underpin grant payments and teacher allocations to schools, based on verified data.

Is it compulsory to include my child on POD?

All pupils must have a record on POD in order to be counted for school's capitation payment and teacher allocation purposes.

Does the school need my consent to put my child's details on POD?

The Department has consulted with the Data Protection Commissioner in relation to the collection of individual pupil information for the Primary Online Database. As both religion and ethnic and cultural background are considered sensitive personal data categories under Data Protection legislation, it is necessary for each individual pupil's parent/guardian to identify their own religion and ethnic or cultural background, and to consent for this information to be transferred to the Department of Education and Skills. All other information held on POD is deemed to be nonsensitive personal data and therefore does not require written permission from parents for the information to be transferred to the Department.

Are schools/the Department of Education allowed ask for my child's PPSN?

Schools, as the provider of a public service, are allowed to ask for a pupil's PPSN as long as there is a valid purpose for collecting it. The Department has consulted with the Data Protection Commissioner and they have stated that PPSN can now be collected by primary schools with the purpose being it is a requirement of the Primary Online Database to validate pupil identity. PPSN is already collected for the Early Childhood Care and Education (ECCE) scheme and by post-primary schools. The Social Welfare Consolidation Act 2005, Section 262 allows for the collection of the PPSN by schools and the Department of Education and Skills, and the Department is on the Department of Social Protection's <u>Register of PPSN users</u>.

Why do you need my child's PPSN?

The PPSN is a unique identifier, so this is the best means of ensuring that there are no duplicate records in the system i.e. that two schools do not have the same child on their roll, and that every child of compulsory school age is receiving an education. It also allows the pupil's educational history to be maintained accurately as he or she changes school.

Who will have access to my child's details?

POD will be accessed by schools through the Esinet portal, a secure network managed and controlled by the Department. It may only be accessed through password controlled accounts. Only schools and a small number of Department staff will have access to an account. No agency or other Government Department will have access to the Primary Online Database. POD application roles have been developed which limit school staff to viewing and maintaining their own pupil records. Access within the Department to POD data is limited to the POD team, which currently consists of fewer than 15 people.

How secure is POD?

Data recorded on POD is stored securely in the Department's database. This database is hosted on the Department's servers which are located in the Revenue Commissioner's data-centre. Access to the servers is protected by both Revenue and Government Networks firewalls. Staff of the Revenue Commissioners do not have access to the data in the database. Data from POD is not stored in a cloud-based system.

Schools have responsibility to ensure the safety and security of all pupil data which they hold. They may only access the data of students currently enrolled in their schools on the POD system.

Who will the data be shared with?

The Department proposes in the future to share some of the personal data stored on POD with other State bodies. These are:

- Central Statistics Office, under the Statistics Acts to assist with the compilation of national statistics.
- The National Council for Special Education, under the Education Welfare Act, in order to assist in supporting resource allocation in relation to pupils with special educational needs.
- The Child and Family Agency, under the Education Welfare Act, to ensure that each child of compulsory school age is in receipt of an education.
- To meet the Department's business needs in regard to the allocation of resources to schools, the Department will share a limited amount of each pupil's personal data, including a child's PPS number with the Department of Public Expenditure and Reform PPSN validation service, or directly with the Department of Social Protection Client Identity Database area, in order to validate the identity of each pupil and ensure that the correct resource allocation is granted to each school. The legal basis for this sharing of data is set out in the Social Welfare Acts.

The Department will put in place a memorandum of understanding with each of these bodies, which includes information n the purpose and legal basis for which the body requires the data, how it will be stored securely, and for how long it will be retained.

How long will information on my child be retained for?

Identifiable pupil data will be retained until the pupil's 19th birthday, so when your child has reached his or her 19th birthday his/her records will be anonymised and their personal details – PPSN, name, address – deleted. The anonymised records will then be used for statistical and longitudinal analysis.

Why are you asking for information about my child's religion and ethnic/cultural background?

The question about ethnic and cultural background has been developed in a process of consultation with the CSO and is based on the question that was asked in the 2011 Census of Population will be used in the 2016 Census of Population. The question give people the opportunity to identify themselves according to their ethnic and cultural background, if they choose to do so.

Information about a pupil's religion and ethnic/cultural background will be as defined by his or her parents. These questions are optional, so you can choose to select 'No Consent' in reply to them, if you wish. The same applies to the question about religion, which is also optional.

Collecting this information allows the Department to gather information about the diversity of our school population. The Data Protection Commissioner has advised that the most equitable way to collect this type of sensitive information is to give all pupils an opportunity to identify their own ethnic and cultural background and consent to the information being passed to the Department, rather than targeting a particular ethnic or cultural group in the data collection. This data will be a useful aid in ensuring that education departments devise policies that help ensure that all children in the education system can reach their potential.

Pupils' religion is requested for statistical purposes only.

What should I do if I don't want my child's details to be put on POD?

A minority of parents object to having their children's details on POD. They must submit their objections <u>in writing</u> so that the school can have an accurate record of the number of pupils. Please note that this objection should be sent <u>to the school</u>.

In the case where parents or guardians object in this manner, a partial record of their child will be created on POD; that is, an unidentifiable record.

Please note that verbal objections to a pupil's data being placed on POD will not suffice, as schools are required by the Department to maintain written records of objections.

How can I find out what information about my child is recorded on POD?

Under the Freedom of Information Act (2014) and the Data Protection Act, parents/guardians are entitled to view a copy of any information held about any child(ren) they are responsible for. If a parent/guardian requests a copy of information held on POD about a child, the Department will request:

- Confirmation of the child's identity (copy of passport/birth certificate or other identification)
- Confirmation of the parent/guardian's identity (copy of passport/birth certificate or other identification)

Requests for POD data should be submitted in writing to the Statistics Section, along with copies of the relevant documentation.

Where can I get more information about POD?

A Helpdesk has been set up and the POD team are there to assist you with any queries you may have about the new database. The Helpdesk can be contacted by phone, at 01 8892311, or by email at pod@education.gov.ie.