HAROLD'S CROSS
Educate Together NS

CCTV Policy

March 2026

Policy on CCTV Systems and Data Management

The Closed-Circuit Television System (CCTV) is installed in Harold's Cross ETNS under the remit of the Board of Management.

Purpose of the Policy

The purpose of this policy is to regulate the use of CCTV, and its associated technology, in the monitoring of the environs of the premises for the purpose of security under the remit of the Board of Management of Harold's Cross ETNS.

Purpose of the CCTV System

The CCTV system is installed externally on the premises to enhance the security of the building and its associated equipment, as well as to reassure occupants that a surveillance security system is in operation at all times, thereby deterring crime, vandalism, and theft in the external environs of the premises.

Scope of this policy

This applies to all personnel in and visitors to Harold's Cross ETNS. It relates directly to the location and use of CCTV, as well as the monitoring, recording, and subsequent use of such recorded material.

General Principles

The Board of Management of Harold's Cross ETNS, as the corporate body, has a statutory responsibility for the protection of the school's property and equipment, as well as providing a sense of security to its employees, students, and invitees to its premises.

The primary aim of the CCTV monitoring of Harold's Cross ETNS premises is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials.

Monitoring for security purposes will be conducted in a professional, ethical, and lawful manner, and any diversion of CCTV security technologies and personnel for other purposes is prohibited by this policy.

Information obtained through video monitoring may only be released when authorised by the Principal, following consultation with the Chairperson of the Board of Management.

CCTV monitoring of public areas, for security purposes, will be conducted in a manner consistent with all existing policies adopted by the Board of Management, including the provisions set down in Equality and other Education-related legislation.

The industry code of practice for video monitoring prohibits monitoring based on the classifications contained in Equality and other related legislation, e.g., gender, marital status, family status, sexual orientation, religion, age, disability, race, or membership of the Traveller community.

Video monitoring of public areas, for security purposes, within the said establishment, is limited to areas that do not violate the reasonable expectation of privacy as defined by law.

Data from the CCTV system will be accessed and used in accordance with the Data Protection Regulations.

Cameras will be located in the following areas:

<u>All external cameras covering the following entrances/exits/areas:</u>

- The Main Entrance
- All fire doors on the ground floor
- All entrance/exit doors on the ground floor
- The entrance to the autism classes
- The bike racks
- The set-down area

Staff, students and parents/guardians will be informed of the location and purpose of the CCTV system as outlined above. The right to access images captured by CCTV cameras shall be in accordance with the Data Protection Acts of 1988-2018.

Data Protection

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1988-2018. Under the Data Protection Acts, a data controller is the individual or the legal person who controls and is responsible for the storage and use of personal information in manual files or in a computerised form. The Data Controller, in respect of images recorded and stored by the CCTV system in the school, is the Board of Management. In most instances, the Principal will act as Data Controller on behalf of the Board of Management.

The personal data recorded and stored by the CCTV system will only be available to the Data Controller and will be used only for the purposes outlined on the signage. The CCTV system shall not be used to monitor staff performance. All footage is used for security purposes only and is only accessed at the request of the Board of Management. Footage is managed by authorised staff only. Requests for access to footage must be relayed to a Board of Management member and only regarding a security concern. Footage is not to be used for any other purpose.

Individuals whose images are recorded and stored by the CCTV system shall have the right to submit a subject access request and receive a copy of personal data processed by the system. Such requests shall be made in writing to the Data Controller and will be complied with without undue delay, and at the latest within one month of receiving the request. The Data Controller can be contacted via email at: principal@haroldscrossetns.com.

The Data Controller will endeavour to locate the images when requested and determine whether disclosure of the image would involve disclosing the images of third parties, and if so, arrangements will be made for those images to be disguised or blurred. As part of a subject access request for CCTV footage, the Data Controller will seek legal advice and support in responding to such requests. The Data Controller, after having sought legal advice, will arrange for a copy of the data to be processed and given to the applicant of the subject access request.

Personal data recorded by the CCTV system shall be retained for a maximum of 28 days. Thereafter, it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in the data room. Unauthorised access to that room is not permitted at any time.

The following procedures shall be followed in the event that An Garda Síochána seeks to view or take a copy of CCTV footage from the school's CCTV systems:

1. The data controller shall satisfy himself/herself that there is an investigation underway.

2. A request from An Garda Síochána must be made in writing on Garda-headed notepaper.

All CCTV systems and associated equipment will be required to be compliant with this policy.

Responsibilities:

The Board of Management will:

- Ensure that a policy is in place, compliant with relevant legislation, to govern the use of CCTV in the school.
- Ensure this policy is reviewed regularly by the Board of Management.

The Principal will:

- Act as Data Controller on behalf of the Board of Management
- Ensure that the CCTV system is used in accordance with the policy set down by the Board of Management
- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within the school
- Ensure that all CCTV monitoring systems are compliant with this policy
- Be responsible for the release of any information or material in compliance with this policy.
- Maintain a record of the release of any material recorded or stored on this system.
- Provide a list of the CCTV cameras, their locations, the associated monitoring equipment, and the capabilities of such equipment to the Board of Management for formal approval.
- Approve the location of temporary cameras to be used during special events that have particular security requirements, and ensure their withdrawal following such events.
- Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the school.
- Advise the Board of Management to ensure that adequate signage, at appropriate and prominent locations, is displayed.
- Ensure that external cameras are not intrusive in terms of their positions and views of residential housing and comply with the principle of" reasonable expectation of privacy". Ensure that recorded material is retained for a period not longer than 28 days and will be erased unless required as part of a criminal investigation or court proceedings, criminal or civil, or other bona fide use as approved by the Board of Management.
- Ensure that monitors are stored in a secure place with access by authorised personnel only.

Communication

This policy will be circulated to all staff.

Ratification and Communication:

This policy was formally ratified by the Board of Management of Harold's Cross Educate Together National School at its meeting held on 11th March 2026.

The policy is next due for review and ratification in January 2029.

A copy of the policy is available on our website and in hard copy by contacting our principal via email at info@haroldscrossetns.com.

The implementation of this policy shall be monitored by the Principal and the Chairperson of the Board of Management.

Signature of Chairperson:

Signature of Principal:

Date: 11th March 2026