HAROLD'S CROSS
Educate Together NS

March 2026

Data Protection Privacy Statement

This policy was ratified by the Board of Management on: 11th March 2026

Data Protection Privacy Statement

Introduction:

This Statement applies to pupils, parents and carers. By enrolling your child in and/or by attending Harold's Cross Educate Together National School you acknowledge and agree to the collection and processing of personal information by the school. Within policies, the Department of Education and Youth can sometimes be referred to as the Department of Education and Science.

Rationale:

Individuals have a number of rights in relation to their personal data, and these rights have been enhanced by the General Data Protection Regulation (GDPR). This Data Protection Statement describes how Harold's Cross Educate Together National School collects and processes 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.

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

Harold's Cross Educate Together National School is a data controller responsible for personal data- i.e. information relating to an identified or identifiable natural person. Harold's Cross Educate Together National School processes personal data, i.e. the school collects, records, stores, retains and uses personal data. Harold's Cross Educate Together National 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; The Chairperson, Board of Management, Harold's Cross ETNS, 151/153 Harold's Cross Road, Dublin 6w, D6WHP44.

2. INFORMATION COLLECTED

Harold's Cross Educate Together National School may collect the following personal information on pupils and parents/carers:

(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 the psychological report,
- 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
- CCTV footage and other information obtained through electronic means

(ii) Sensitive Personal Information – Pupils

Harold's Cross Educate Together National 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 the administration of medicine
- Religious belief and confirmation of engagement or non-engagement in Religious Sacraments,
- Membership of the Traveller Community
- Racial or Ethnic origin

(iii) Parent/Carer Information

Harold's Cross Educate Together National School may collect and process the following personal information from parents/carer such as:

- Contact details of parent (s)/guardian(s) 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 the school website / print media etc.
- Records, correspondence or notes arising from interaction with Parents / Guardians

3. PURPOSE & LEGAL BASIS FOR COLLECTING & PROCESSING INFORMATION

Harold's Cross Educate Together National School collects and processes personal information (as listed above) about pupils and parents/guardians for a variety of purposes and relies on several legal grounds to do so. Harold's Cross Educate Together National School requires this information to perform our duties and responsibilities and to comply with our legal and statutory obligations. In addition, Harold's Cross Educate Together National 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 Harold's Cross Educate Together National School and managing the education and welfare needs of our pupils. Harold's Cross Educate Together National School processes personal data on the basis of the following lawful purposes:

a) Legal Obligation

Harold's Cross Educate Together National 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, the Teaching Council Acts 2001-2015 and Safety Health and Welfare at Work legislation

b) Legitimate Interests

Harold's Cross Educate Together National 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/guardians to be contacted in the case of emergency, school closures, and to inform parents/guardians of their child's educational progress
- Secure and benefit from the support and services of relevant third parties.

c) Consent

Harold's Cross Educate Together National School may sometimes process some of the 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

Harold's Cross Educate Together National 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 Harold's Cross Educate Together National School.

(ii) Parents/Guardians

Harold's Cross Educate Together National 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 Harold's Cross Educate Together National School.

5. INFORMATION AND THIRD PARTIES

Harold's Cross Educate Together National School may receive from, share and/or transfer information to a range of third parties such as the following:

- *The Department of Education and Youth*
- *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, printers, lawyers and other advisors, and providers of security and administrative services, including data

processing/cloud storage service providers (i.e. Aladdin and Google Drive).

6. DATA RETENTION

We will only retain personal information for as long as it is necessary to fulfil the purposes for which the information was collected, including any legal, accounting or reporting requirements (See Appendix 1 of Data Protection Policy re: Retention periods).

7. TRANSFER OF PERSONAL INFORMATION OUTSIDE THE EUROPEAN UNION

Harold's Cross Educate Together National 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 receives 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 refer to the school's Data Protection Policy, Data Access Request Procedures Policy, or contact us at the school as outlined above. These policies reflect the procedures which are in place when the information relates to children under the age of eighteen years of age.

9. UPDATES

We will update this data protection statement from time to time. Any updates will be made available and, where appropriate, notified to you.

Privacy Statement Review:

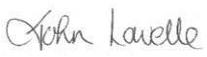
This privacy statement will be reviewed as necessary, and particularly to comply with any relevant changes to DEY guidelines and circular or legislation.

Ratification, communication and implementation:

This privacy statement was ratified and adopted by the Board of Management of Harold's Cross Educate Together National School on 11th March 2026.

This privacy statement will be circulated to all parent(s)/guardians(s) following ratification and a copy will be published on the school website. This privacy statement will be brought to the attention of all staff members upon their appointment to the school.

The implementation of the privacy statement shall be monitored by the Principal and the Chairperson of the Board of Management.

Signature of Chairperson: 

Signature of Principal:

Date: 11th March 2026