



Harold's Cross
ETSS

CCTV Policy

Rationale for the Policy

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of Harold's Cross ETSS.

Introduction

Harold's Cross ETSS is committed to the care of its students, staff and wider school community. This duty of care is at the core of the school's characteristic spirit and responds also to its statutory responsibility under the provisions of the Safety, Health and Welfare at Work Act 2005 and associated legislation.

The main purpose of CCTV systems on school premises is to assist in the maintenance of safety and security (personal and property related) and to facilitate proceedings in the context of criminal or civil issues. In this context, safety includes the health and safety of School staff and students and others attending or visiting the School. The CCTV systems may also be used to assist investigations carried out under School policies. In the operation of CCTV systems, the School has regard for the protection of the right to privacy enjoyed by School staff and students as well as visiting members of the public. Those charged with the operation of CCTV systems in the School seek to ensure that the systems are not used in any unauthorized or inappropriate manner.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Board of Management of Harold's Cross ETSS. Recognisable images captured by CCTV systems are personal data. They are therefore subject to the provisions of the Data Protection Acts 1988 and 2018 and are managed in accordance with the school's Data Protection Policy.

General Operations of the CCTV System

The use of the CCTV system at Harold's Cross ETSS is conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee/student performance.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Dignity in the

Workplace Policy and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislations e.g. race, gender, sexual orientation, national origin, disability etc. Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Location of Cameras

The location of cameras is a key consideration. Harold's Cross ETSS has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed in order to record external areas shall be positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

Examples of CCTV Video Monitoring and Recording of Public Areas in Harold's Cross ETSS premises may include the following:

- Protection of School/College/Education & Administrative Centre Buildings and property: Building perimeter, entrances and exits, lobbies and corridors, reception, receiving areas for goods/services
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarm: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Main entrance/exit Gates, Traffic Control
- Criminal Investigations (carried out by An Garda Síochána): Robbery, burglary and theft surveillance

Main Provisions

- 1) We are Harold's Cross Educate Together Secondary School, based in 151-153 Harold's Cross Road, Dublin 6W, D6W HP44.
- 2) We provide secondary level education.
- 3) We operate Closed Circuit Television Systems ("CCTV") on our premises during daytime hours and night-time hours, typically, 24 hours a day - 7 days per week. CCTV is used at external points on our premises (e.g. at main gate, in the main walkway etc.) and at certain internal points (e.g., reception area, corridors etc).

- 4) In areas where CCTV is in operation, appropriate notices will be displayed.
- 5) We use CCTV for security purposes; to protect premises and assets; to deter crime and anti-social behaviour; to assist in the investigation, detection, and prosecution of offences; to monitor areas in which cash and/or goods are handled; to deter bullying and/or harassment; to maintain good order and ensure the Code of Positive Behaviour is respected; to provide a safe environment for all staff and students; for verification purposes and for dispute-resolution, particularly in circumstances where there is a dispute as to facts and the recordings may be capable of resolving that dispute; for the taking and defence of litigation.
- 6) We may share and transfer CCTV images/recordings to third parties. In appropriate circumstances, we may share CCTV images/recordings to:
 - An Garda Síochána (for the investigation, detection and prevention of offences);
 - to social workers, HSE, and/or TUSLA (in respect of any child protection and/or child safeguarding matters);
 - to the Department of Education and Skills and/or any section 29 Appeals Committee (in relation to any Code of Positive Behaviour, suspension, or expulsion process);
 - to the Teaching Council (where we are legally required in relation to any process under the Teaching Council Acts 2001 – 2015, including fitness to teach investigation);
 - to the school's insurance company and legal advisors (for dispute resolution and litigation purposes) etc.
- 7) We do not transfer your personal data to a third country or international organisation.
- 8) We do not engage in automated decision making/profiling.
- 9) CCTV is generally held for 21 days. In certain circumstances, CCTV recordings may be held for longer, for example:
 - (a) Where a break-in or theft is recorded (in which case they will be held and passed to An Garda Síochána, and/or the schools insurance company and legal advisors).
 - (b) Where an injury/accident occurs (in which case CCTV may be retained and may subsequently be passed to the school's insurance company, its legal advisors, the Health & Safety Authority).

(c) Where a breach of the Code of Positive Behaviour is reported resulting in a student being disciplined, in which case the recordings will be retained to be viewed by parents of the affected student (if the images can be appropriately redacted/pixelated to protect the personal data of third parties, *see Access Requests*), the Board of Management or a duly constituted section 29 appeals committee convened by the Department of Education and Skills for the purposes of hearings, appeals, dispute resolution and/or verification purposes. These examples are not exhaustive, and there will be other situations where the CCTV is retained for longer than 21 days where there is a legal basis and/or we are legally required to do so.

10) Access requests: On written request, any person whose image has been recorded (Data Subject) has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. A Data Subject should provide all the necessary information to assist in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the school. To exercise their right of access, a data subject must make an application in writing to the Board of Management of Harold's Cross ETSS.

Adopted by the Board of Management on Wednesday 31st July 2024.

Sarah Hegan

Signed _____ Date 31st July 2024

Chairperson, Board of Management

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Signed _____ Date 31st July 2024

Principal/Secretary to the Board of Management

Review

The policy will be reviewed and evaluated every two years, or more frequently if needed to reflect changing legislation or guidelines (e.g. from the Data Protection Commissioner, An Garda Síochána, Department of Education and Skills, etc.)