



CCTV Policy



Scoil Chaitríona Bóthar Mobhí

2025

Scoil Chaitríona

Bóthar Mobhí

Glas Naíon

Príomhoide: Fíona Ní Chatháin

Príomhoide Tánaisteach: Katie Ní Dhubhláin

1. Introduction

This policy outlines the use of Closed-Circuit Television (CCTV) at Scoil Chaitríona in compliance with relevant legislation, including the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988, 2003 and 2018.

2. Purpose of CCTV

The primary purposes of the CCTV at Scoil Chaitríona are:

- To protect the safety and welfare of students, staff, and visitors.
- To prevent bullying.
- To safeguard school property and prevent vandalism, theft or damage.
- To ensure that the school rules and policies are respected so that the school can be properly managed.
- To assist in the investigation of any incidents that may occur within the school premises.

3. Scope of CCTV Coverage

CCTV cameras may be placed in the following areas:

- Entrances and exits of school buildings.
- Corridors and common areas.
- Car parks and outdoor school grounds.
- Other areas deemed necessary for security purposes.

CCTV cameras will not be installed in areas where individuals have a heightened expectation of privacy, such as toilets or staff rooms.

4. General Principles

The school has a responsibility for the protection of its property and equipment as well as providing a sense of security to its employees, students and invitees to its premises. The school owes a duty of care under the provisions of the Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the particular school/centre community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be 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 performance.

Information obtained through the CCTV system may only be released when authorised by the Principal. Any requests for CCTV recordings/ images from An Garda Síochána will be fully recorded and legal advice will be sought if any such request is made. (See “Access” at section (7) below). If a law enforcement authority, such as An Garda Síochána, is seeking a recording for a specific investigation, An Garda Síochána may require a warrant and accordingly any such request made by An Garda Síochána should be requested in writing and the school will immediately seek legal advice.

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 at Work 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 legislation 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 reasonable expectation to privacy.

Information obtained in violation of this Policy may not be used in a disciplinary proceeding against an employee of the school or a student. All CCTV systems and associated equipment will be required to be compliant with this Policy following its adoption by the school.

Recognisable images captured by CCTV systems are “personal data”. They are therefore subject to the provisions of the Data Protection Acts 1988, 2003 and 2018.

5. Legal Basis for Processing Data

The use of CCTV is based on the legitimate interests of the school to maintain a safe environment and prevent crime. The school is committed to ensuring that all processing of CCTV data complies with data protection laws.

6. Data Storage and Retention

- CCTV footage will be securely stored and only accessed by authorised personnel.
- Footage will be retained for no longer than 28 days unless required for an investigation, as per the Data Protection Act.
- The images/ recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV system is: the responsibility of the Principal.
- After the retention period, footage will be permanently deleted unless needed for legal or disciplinary purposes.

7. Access to CCTV Footage

- Access to recorded footage is restricted to the Principal and other members of staff nominated by the Principal for that purpose. Supervising the access and maintenance of the CCTV System is the responsibility of the Principal. The Principal may delegate the administration of the CCTV System to another staff member. In certain circumstances, other individuals may also view the recordings in order to achieve the objectives set out above (such individuals may include the Gardaí, the Deputy Principal, the relevant Year Head, other members of the teaching staff, representatives of the Department of Education and Skills, etc).
- Individuals whose data has been recorded have the right to request access to their personal data under GDPR, subject to legal exemptions.
- Requests for access should be made in writing to the school’s Data Protection Officer.
- Requests are approved by the School Principal.
- A log of access to tapes/ images must be maintained.

8. Data Security

- CCTV footage will be stored securely to prevent unauthorised access.
- The school will implement appropriate technical and organisational measures to protect recorded data.

9. Third-Party Disclosure

CCTV footage will not be shared with third parties except in the following circumstances:

- When required by An Garda Síochána for the investigation of a crime.
- When required by legal proceedings.
- When necessary for disciplinary investigations.

10. Signage and Awareness

- Clear signage will be displayed to inform individuals that CCTV is in operation.
- The CCTV policy will be made available on the school website to staff, students, and parents.

Signage shall include the name and contact details of the data controller as well as the specific purpose for which the CCTV camera is in place in each location (see signage below).

11. Security Company

Where a school CCTV system is controlled by a security company contracted by the school, the following applies:

The school will have a written contract with the security company in place which details the areas to be monitored, how long data is to be stored, what the security company may do with the data; what security standards should be in place and what verification procedures may apply. The written contract should also state that the security company will give the school all reasonable assistance to deal with any data access request made under section 4 Data Protection Acts 1988, 2003 and 2018 which may be received by the school within the statutory time-frame (one month).

12. Policy Implementation & Review

This policy will be reviewed regularly to ensure compliance with legal requirements and best practices.

This policy was ratified by the Board of Management on 08/04/2025

Signed: _____

Signed: _____

Chairperson Board of Management

Principal

Date: _____

Date: _____

Date of next review: 2028



RABHADH/ WARNING

Ceamaraí TCI i bhfeidhm/ CCTV cameras in operation

Tá monatóireacht agus taifeadadh á dhéanamh ar íomhánna ar mhaithe le coireacht a chosc, le hiompraíocht fhrithshóisialta a chosc, le bulaíocht a chosc, ar mhaithe le sábháilteacht ár bhfoirne agus na mac léinn agus chun Scoil Chaitríona agus a gcuid maoine a chosaint. Feidhmeofar an córas seo 24 uair sa lá, gach lá. Is féidir na híomhánna seo a chur ar aghaidh chuig An Garda Síochána.

*Images are being monitored and recorded for the purpose of crime prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of **Scoil Chaitríona** and its property. This system will be operated 24-hours a day, every day. These images may be passed to An Garda Síochána.*

Tá an córas seo á rialú ag **Bord Bainistíochta Scoil Chaitríona/**

*This system is controlled by **The Board of Management of Scoil Chaitríona***

agus á fheidhmiú ag ADT/ and operated by ADT

Do thuilleadh eolais, déan teagmháil le hOifig na Scoile ar 01 8370762.

Tá an Polasaí TCI le fáil ar www.scoilchaitriona.ie.

For more information, contact the School Office on 01 8370762.

View the CCTV Policy on www.scoilchaitriona.ie.

APPENDIX 1

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the CCTV Policy:

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

The Data Protection Acts – The Data Protection Acts 1988 and 2003 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All ETB staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data under section 4 of the Data Protection Acts.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.

APPENDIX 2 - PRIVACY IMPACT ASSESSMENT

Before the school installs a new CCTV system, it is necessary that a documented data protection impact assessment is carried out.

Some of the points that might be included in a Privacy Impact Assessment are:

- What is the school's purpose for using CCTV images? What are the issues/problems it is meant to address?
- Is the system necessary to address a pressing need, such as staff and student safety or crime prevention?
- Are the CCTV cameras intended to operate on the outside of the premises only?
- Is it justified under the circumstances?
- Is it proportionate to the problem it is designed to deal with?
- Is it intended that CCTV cameras will operate inside of the building?
- Are internal CCTV cameras justified under the circumstances?
- Are internal CCTV cameras proportionate to the problem they are designed to deal with?
- What are the benefits to be gained from its use?
- Can CCTV systems realistically deliver these benefits? Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?
- Do you need images of identifiable individuals, or could the system use other images which are not capable of identifying the individual?
- Will the system being considered deliver the desired benefits now and remain suitable in the future?
- What future demands may arise for wider use of images and how will they be addressed?
- Where a management company is in place, are you satisfied that it complies with the Data Protection Acts with regard to the processing of images of staff, students and visitors to your school captured on any CCTV systems under its management?
- What are the views of those who will be under CCTV surveillance?
- What could be done to minimise intrusion for those whose images may be captured, particularly if specific concerns have been expressed?
- How have staff, students and visitors been assured by the school that the CCTV system will be used only for the stated purposes?
- Does the school's policy on the use of CCTV make it clear that staff (teaching and non-teaching) will not be monitored for performance or conduct purposes?
- Have the views of staff & students regarding the location of cameras been taken into account?

- Can the location of each internal camera be justified in accordance with the overall purpose for the use of the CCTV system?
- Has appropriate signage been erected at the location of each internal camera indicating that recording is taking place and outlining the purpose of such recording?
- Who will have access to the system and recordings/images?
- What security measures are in place to protect the CCTV system and recordings/images?
- Are those who will have authorised access to the system and recordings/images clear about their responsibilities?
- Are the camera monitors kept out of view of staff, students and visitors and is access to the camera monitors restricted to a limited number of staff on a 'need to know' basis?
- Is the room(s) which houses the camera monitors and the CCTV system securely locked when unattended?
- Does the school have a procedure in place to ensure that recordings/images are erased or deleted as soon as the retention period (28 days) has expired?
- Does the school have a procedure in place for handling requests for access to recordings/images from An Garda Síochána?
- Will appropriate notices be in place to ensure that individuals know that they are being monitored?
- Does the school have a Data Protection Policy? Has it been updated to take account of the introduction of a CCTV system?
- Does the school have a procedure in place to handle access requests seeking a copy of images recorded by the CCTV system (within the statutory timeframe of one month)?
- Has the right of access been communicated to staff, students and visitors?
- Has the school communicated its policy on the use of CCTV to staff, students and visitors and how has this been done?
- How are new students and new staff informed of the school's policy on the use of CCTV?