

CCTV POLICY

MAY 2026

St. Brendan's Community School

St. Brendan's Community School Mission Statement

"Our aim is to create a caring community of learning where each individual is valued as a unique human being."

Introduction

Closed Circuit Television Systems (CCTVS) are installed in St. Brendan's Community School, Birr. New CCTV systems will be introduced in consultation with staff, the Board of Management and the Parents' Association. Existing systems will be reviewed regularly.

This policy reflects the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Purpose of Policy

The purpose of this policy is to regulate the use of CCTV and associated technologies in monitoring the school's internal and external environments.

CCTV is used for the following purposes:

- Protecting school buildings and assets.
- Promoting the health and safety of staff, students, and visitors.
- Preventing bullying.
- Reducing crime and anti-social behaviour.
- Supporting An Garda Síochána in crime deterrence and investigation.
- Assisting in identifying and prosecuting offenders.
- Ensuring compliance with school rules.

CCTV processing is carried out under Article 6(1)(e) GDPR (public task) and the Data Protection Act 2018.

Scope

This policy applies to all CCTV installations, monitoring systems and recording equipment used on the school premises.

This policy complies with the following legislation:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Garda Síochána (Recording Devices) Act 2023
- Children First Act 2015

General Principles

St. Brendan's Community School has a duty of care under the Safety, Health and Welfare at Work Act 2005.

- CCTV will not be used to monitor staff performance or classroom teaching.
- The use of CCTV must be necessary, proportionate, and justified.
- Any release of footage must be authorised by the Principal.
- Requests from An Garda Síochána will be processed in accordance with the Garda Síochána (Recording Devices) Act 2023.

A Data Protection Impact Assessment (DPIA) is mandatory before installing new cameras or significantly altering existing systems due to the high-risk nature of CCTV processing.

The DPIA will assess:

- Necessity
- Proportionality
- Risks to individuals
- Safeguards and mitigations

Justification for CCTV Policy

The school must document and maintain evidence showing that CCTV use is:

- Necessary
- Proportionate
- The least intrusive method available

This includes compliance with GDPR Article 6 and DPIA requirements.

Location of Camera's

Cameras will be located in areas where individuals have a low expectation of privacy. External cameras will be positioned to avoid recording neighbouring properties.

Covert Surveillance

The school will not engage in covert surveillance.

Any request from An Garda Síochána for covert operations must be made in writing and may require judicial authorisation.

Notification Signage

Signage will clearly state:

- That CCTV is in operation.
- The purpose(s) of recording.
- Contact details of the Data Controller.
- Contact details of the Data Protection Officer (if appointed).
- A link or indication of where the full CCTV policy can be accessed.

This is in line with GDPR transparency requirements (Article 13).



WARNING
CCTV cameras in operation
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 St. Brendan's Community School and its property. This system will be in operation 24 hours a day, every day. These images may be passed to An Garda Síochána.

Storage and Retention

All recordings will be stored securely.

Retention period:

- Maximum retention is **28 days**, unless required for an active investigation.
- Any extension must be documented and justified.

Access

Access to recordings is restricted to the Principal and authorised personnel.

Footage may be released to:

- An Garda Síochána
- HSE child protection officers
- Parents/guardians (subject to rights of the child)
- Data subjects via a formal request

Data Subject Access Requests (DSARs)

- Requests will be completed within **one month.**
- Images of third parties will be redacted where necessary.

Individuals have the right to:

- Access their personal data
- Request erasure (where applicable)
- Restrict processing
- Lodge a complaint with the Data Protection Commission

Students aged 17 and older generally exercise their own data rights directly.

The cost associated with any application will be borne by the applicant.

Responsibilities

The Principal is responsible for:

- Overseeing the CCTV system
- Maintaining an access log
- Ensuring signage is adequate
- Ensuring secure storage
- Ensuring camera angles respect privacy

A Data Protection Officer (if appointed) is responsible for:

- Advising on DPIAs
- Ensuring GDPR compliance
- Assisting with data subject requests

Security Companies

Any security company acting on behalf of the school must comply with Article 28(3) GDPR. Contracts must include:

- Confidentiality obligations
- Security measures
- Processing instructions
- Cooperation with DSARs

Ratification, Implementation and Review

- This policy was ratified by the Board of Management on 28/5/26
- This policy has been made available to School Personnel and the Parents' Association. It is also published on the School Website and the School App. A copy of this policy will be made available to the Department of Education and the patron upon request.
- This policy and its implementation will be reviewed by the Board of Management once every two years. Written notification that the review has been completed will be made available to School Personnel and the Parents' Association. The review will also be published on the School Website. A record of the review and its outcome will be made available, if requested, to the patron and the Department of Education.

Signed: Mary Loughnane Acting

Joan Hogan

Chairperson of Board of Management

Date: 28/5/26

Signed:

John Kennedy

Principal/Secretary of Board of Management

Date: 28/5/26

Date of next review: _____

APPENDIX A - DEFINITIONS

Personal Data: Any information relating to an identified or identifiable natural person.

Processing: Any operation performed on personal data, including collection, storage, retrieval, disclosure, erasure, or destruction.

Data Controller: The organisation (St. Brendan's Community School) that determines the purpose and means of processing personal data.

Data Processor: A third party that processes personal data on behalf of the controller.

Data Subject: Any living individual whose data is processed.

CCTV Data: Any recorded images or associated data captured by the CCTV system.

APPENDIX B – DPIA Template

A DPIA must include the following sections:

1. **Description of Processing:**
    - Purpose of CCTV installation
    - Locations of cameras
    - Categories of data subjects
    - Types of data collected
    -
2. **Assessment of Necessity & Proportionality:**
    - Why CCTV is required
    - Whether less intrusive alternatives were considered
    -
3. **Risk Assessment:**
    - Risks to individuals' privacy
    - Likelihood and severity of risks
    -
4. **Mitigation Measures:**
    - Technical and organisational safeguards
    - Restricted access to recordings
    - Encryption or secure storage
    -
5. **Consultation:**
    - Engagement with staff, students, parents, or Data Protection Officer
    -
6. **Outcome Approval:**
    - Decision to proceed, amend, or halt CCTV use
    - Signature of Principal and DPO

APPENDIX C – Signage Requirements

All CCTV signage must include:

- A clear statement that CCTV is in operation.
- The purpose of CCTV (e.g., security, safety, crime prevention).
- Name and contact details of the Data Controller:

St. Brendan's Community School, Birr, Co. Offaly

- Contact details of the Data Protection Officer (if appointed).
- A link or reference to the school's CCTV policy.

Example Signage Text

CCTV in Operation
Images are recorded for the purposes of security, safety and crime prevention. Data Controller: St. Brendan's Community School, Birr, Co. Offaly. For more information, please see our CCTV Policy.