

Ratified by BoM Date: \_\_\_\_\_

Review Date: \_\_\_\_\_



# St Francis National School

Rock Road, Blackrock, County Louth, A91 NHOV

Tel: 042 9366993 Email: admin@stfrancisns.ie Web: www.stfrancisns.ie

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## CCTV Policy

### INTRODUCTION

Closed Circuit Television Systems (CCTVS) are installed in St. Francis NS. Their operation will be reviewed regularly in consultation with staff, the BoM and the parents' association.

### PURPOSE OF 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 the BoM of St. Francis NS (The Data Controller).

CCTV systems are installed externally in the premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the School/ETB is intended for the purposes of:

1. protecting the school buildings and school assets, both during and after school hours;
2. promoting the health and safety of staff, pupils and visitors;
3. preventing bullying;
4. reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
5. supporting the Gardaí in a bid to deter and detect crime;
6. assisting in identifying, apprehending and prosecuting offenders; and
7. ensuring that the school rules are respected so that the school can be properly managed

### SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out off site, St. Francis NS will ensure that CCTV systems,

where installed, are operated only in a way that is compatible with the provisions of this policy.

## **GENERAL PRINCIPLES**

The BoM of St. Francis NS, as the corporate body has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, students and invitees to its premises. The BoM of St. Francis NS owes a duty of care under the provisions of 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 school 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, following consultation with the Chairperson of the BoM. Any requests for CCTV recordings/images from An Garda Síochána will be fully recorded and legal advice from the data protection commissioner/legal advice will be sought if any such request is made. (See "Access" below)

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

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

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 BoM of St. Francis NS. Recognisable images captured by CCTV systems are personal data. They are therefore subject to the provisions of the Data Protection Acts 1988 to 2018.

## **JUSTIFICATION FOR USE OF CCTV**

Data Protection legislation requires that data is “adequate, relevant and not excessive” for the purpose for which it is collected. This means that the BoM of St. Francis NS needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the BoM. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

### **CCTV systems will not be used to monitor normal teacher/student classroom activity in school**

## **LOCATION OF CAMERAS**

The BoM of St. Francis NS has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas in St. Francis NS may include the following:

Protection of school buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, 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 Alarms: Intrusion alarms, exit door controls, external alarms

Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control

Criminal Investigations (carried out by An Garda Síochána): Robbery, burglary and theft surveillance

## **COVERT SURVEILLANCE**

St. Francis NS will not engage in covert surveillance

Where An Garda Síochána requests to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by An Garda Síochána will be requested in writing and the school will seek Data Protection Commissioner/legal advice.

## **NOTIFICATION – SIGNAGE**

The Principal will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the school. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. The location of CCTV cameras will also be indicated to the BoM.

Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to St. Francis NS property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.



**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. Francis NS and its property. This system will be in operation 24 hours a day, every day. These images may be passed to An Garda Síochána.**

**This system is controlled by the Board of Management of St. Francis NS  
For more information contact the School Principal on 042 9366993**

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area
- at or close to each internal camera

## **STORAGE & RETENTION**

Data Protection legislation states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

**Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.**

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 BoM. The Principal may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Gardaí, the Deputy Principal, other members of the teaching staff, representatives of the Department of Education and Skills, representatives of the HSE and/or the parent of a recorded student). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

## **ACCESS**

Tapes/DVDs/portable storage devices will be stored in a secure environment. Access will be restricted to authorised personnel. The area will be locked when not occupied by authorised personnel. A log of access to tapes/images will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. the Principal of the school and An Garda Síochána (upon application).

In relevant circumstances, CCTV footage may be accessed:

1. By An Garda Síochána where St. Francis NS (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
2. Following a request by An Garda Síochána when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on St. Francis NS property, or
3. By the HSE and/or by any other statutory body charged with child safeguarding; or
4. To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case the parents/guardians will be informed; or

5. To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to St. Francis NS, or
6. To individuals (or their legal representatives) subject to a court order
7. To the school/ETB's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property

**Requests by An Garda Síochána:** Information obtained through video monitoring will only be released when authorised by the Principal following consultation with the Chairperson of the BoM. If An Garda Síochána requests CCTV images for a specific investigation, An Garda Síochána may require a warrant and accordingly any such request made by An Garda Síochána should be made in writing and the school should immediately seek legal advice.

**Access requests:** On written request, any person whose image has been recorded 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. To exercise their right of access, a data subject must make an application in writing to the school Principal/CEO of the ETB. The school must respond **within 1 month**.

**Access requests can be made to the following:**

Oreena Lawless (Principal), St. Francis NS, Rock Road, Blackrock, Co. Louth A91 NH0V

A person should provide all the necessary information to assist St. Francis NS 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.

In giving a person a copy of their data, the school may provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

**RESPONSIBILITIES**

The Principal will:

1. Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the BoM St. Francis NS.
2. Oversee and coordinate the use of CCTV monitoring for safety and security purposes within St. Francis NS.
3. Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy

4. Ensure that the CCTV monitoring at St. Francis NS is consistent with the highest standards and protections
5. Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
6. Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system
7. Ensure that monitoring recorded tapes are not duplicated for release
8. Ensure that the perimeter of view from fixed location cameras conforms to this policy
9. Give consideration to both students' and staff feedback and/or complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
10. Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
11. Cooperate with the Health & Safety Officer of St. Francis NS in reporting on the CCTV system in operation in the school
12. Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
13. Ensure that monitoring tapes/DVDs/digital recordings are stored in a secure place with access by authorised personnel only
14. Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the BoM
15. Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
16. Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
17. Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

## **IMPLEMENTATION & REVIEW**

This policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, An Garda Síochána, Department of Education and Skills, Audit units (internal and external to the school), national management bodies, legislation and feedback from parents/guardians, students, staff and others.

**Communication**

This policy will be available in the Plean Scoile and on the school website.

**Responsibility for Review:**

All members of staff, Parents Association, Board of Management

**Timeframe for Review:**

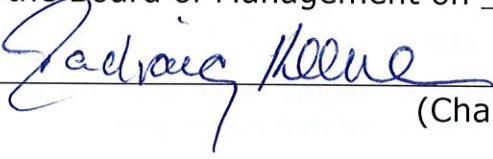
This policy will be reviewed every three years, or as required to meet the needs of the school.

**Next review:** February 2026

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**CCTV Policy**

Ratified by the Board of Management on 4/2/2023 (Date)

Signed:  (Chairperson, Board of Management)





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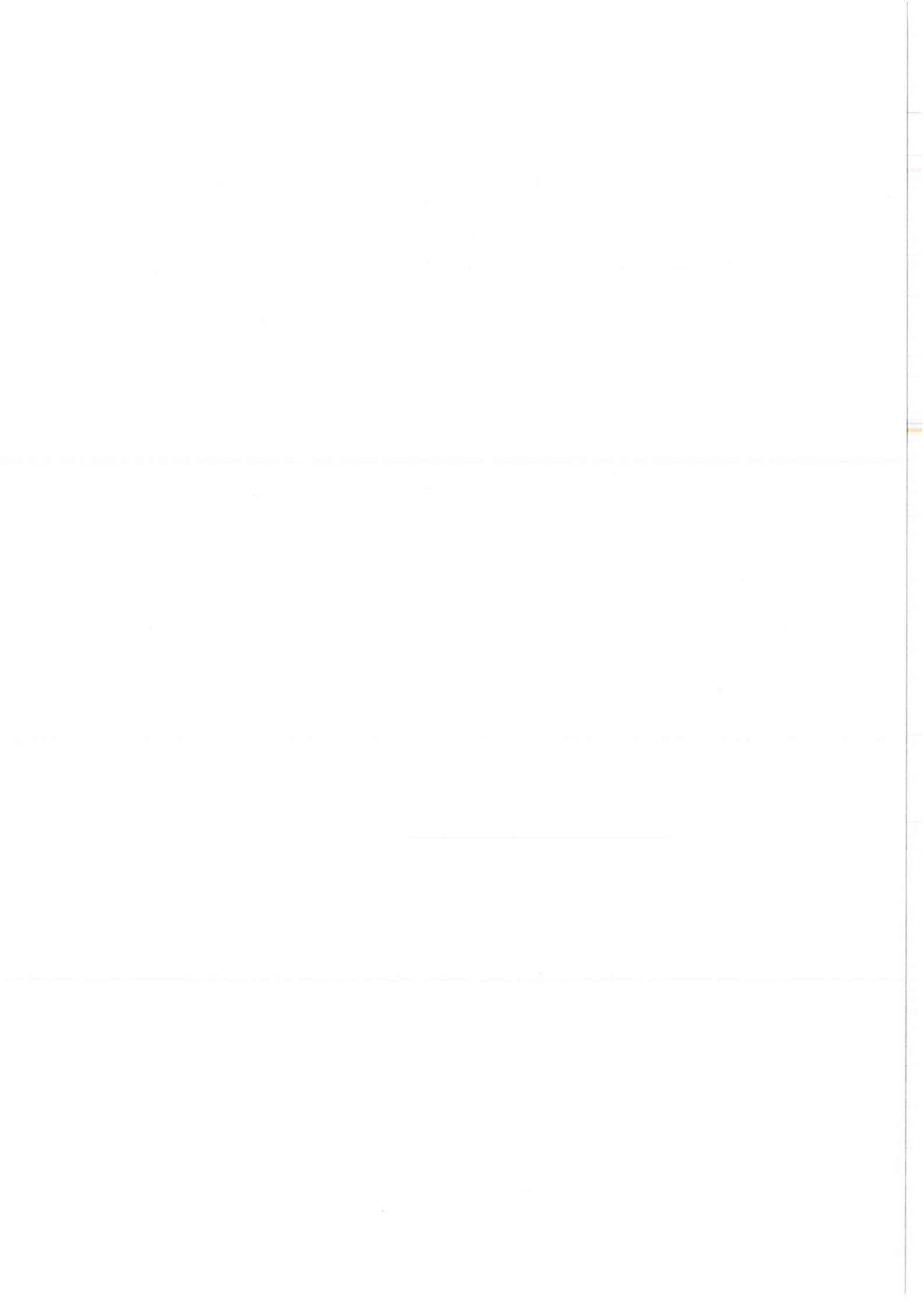
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## Privacy Impact Statement

1. The purpose of recorded CCTV data is to monitor and provide evidence of any happenings within the school premises, both during and after school hours.
2. The recordings provide visual evidence which may be used in an investigation of an incident (assault, break-in, vandalism etc.).
3. The system is necessary to address staff and student safety and crime prevention.
4. The CCTV cameras intended to operate on the outside of the premises only.
5. CCTV cameras will not operate inside of the building.
6. The CCTV system may capture images of identifiable individuals.
7. The Board of Management and the Gardaí may view the footage held in the investigation of incidents.
8. The BOM is the data controller for the entire CCTV system.
9. No individual will be under CCTV surveillance. The cameras are directed at the parking areas and over the entrance to the school. Individuals recorded are aware that it is for security purposes.
10. To minimise intrusion for those whose images may be captured, particularly if specific concerns have been expressed, only the Data Controller and the Gardaí have access to the recordings.

11. Staff, students and visitors are assured by the School Policy on the use of CCTV that they will not be monitored and that the CCTV system will be used only for the stated purposes.
12. The school's policy on the use of CCTV makes it clear that staff (teaching and non-teaching) will not be monitored for performance or conduct purposes.
13. The views of staff & students regarding the location of cameras have been taken into account.
14. Only the Data Controller and the Gardaí will have access to the system and recordings/images.
15. The security measures in place to protect the CCTV system and recordings/images include the CCTV system being in an area where it may not be viewed by anyone other than the Data Controller and the Gardaí.
16. Those who will have authorised access to the system and recordings/images clear about their responsibilities.
17. The camera monitors are kept out of view of staff, students and visitors and access to the camera monitors is restricted to a limited number of staff on a 'need to know' basis.
18. The room which houses the camera monitors and the CCTV system are securely locked when unattended.
19. The school has a procedure in place to ensure that recordings/images are erased or deleted as soon as the retention period (28 days) has expired.
20. The school has a procedure in place for handling requests for access to recordings/images from An Garda Síochána. The Gardaí contact the Data Controller directly, and only they view the recorded images together.
21. Appropriate notices are in place to ensure that individuals know that they are being monitored.
22. The school has a data protection policy which takes account of the CCTV system.
23. The school will handle access requests in writing from those seeking a copy of images recorded by the CCTV system within the statutory timeframe of 28 days.

24. The right of access has been communicated to staff, students and visitors.
25. The policy and procedures on the use of CCTV are available to staff, students and visitors on our website.
26. New students and new staff are informed of the school's policy on the use of CCTV through signage and induction of staff by nominated staff mentor.





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## Privacy Impact Assessment

1. What is the school's purpose for using CCTV images?  
***The purpose of recorded CCTV data is to monitor and provide evidence of any happenings within the school premises, both during and after school hours.***
2. What are the issues/problems it is meant to address?  
***The recordings provide visual evidence which may be used in an investigation of an incident (assault, break-in, vandalism etc.).***
3. Is the system necessary to address a pressing need, such as staff and student safety or crime prevention?  
**Yes.**
4. Are the CCTV cameras intended to operate on the outside of the premises only?  
**Yes**
5. Is it justified under the circumstances?  
**Yes**
6. Is it proportionate to the problem it is designed to deal with?  
**Yes**
7. Is it intended that CCTV cameras will operate inside of the building?  
**No**
8. Can CCTV systems realistically deliver these benefits?  
**Yes**
9. Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?  
**No**

10. Does the school need images of identifiable individuals?  
**Yes**
11. Could the system use other images which are not capable of identifying the individual?  
**No**
12. Will the system deliver the desired benefits now and remain suitable in the future?  
**Yes**
13. What future demands may arise for wider use of images and how will they be addressed?  
**The Gardaí may ask to view the footage we hold in their investigation of incidents.**
14. Is the school BOM the data controller for the entire CCTV system (bearing in mind that some schools under the PPP are managed for operational purposes by management companies, in which case specific legal advice may need to be sought)?  
**Yes**
15. What are the views of those who will be under CCTV surveillance?  
**No individual is under surveillance. The cameras are directed at the parking areas and over the entrance. Those recorded are aware that it is for security purposes and accept that.**
16. What could be done to minimise intrusion for those whose images may be captured, particularly if specific concerns have been expressed?  
**Only the Data Controller and the Gardaí have access to the recordings.**
17. How have staff, students and visitors been assured by the School that they will not be monitored and that the CCTV system will be used only for the stated purposes?  
**Yes**
18. 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?  
**Yes**
19. Have the views of staff & students regarding the location of cameras been taken into account?  
**Yes**

20. Can the location of each internal camera be justified in accordance with the overall purpose for the use of the CCTV system?  
**Yes**

21. Who will have access to the system and recordings/images? **Data Controller and the Gardaí**
22. What security measures are in place to protect the CCTV system and recordings/images?  
**The CCTV system is not in an area where it may be viewed by anyone other than the Data Controller and the Gardaí.**
23. Are those who will have authorised access to the system and recordings/images clear about their responsibilities?  
**Yes**
24. 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?  
**Yes**
25. Is the room(s) which houses the camera monitors and the CCTV system securely locked when unattended?  
**Yes**
26. 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?  
**Yes**
27. Does the school have a procedure in place for handling requests for access to recordings/images from An Garda Síochána?  
**Yes**
28. Will appropriate notices be in place to ensure that individuals know that they are being monitored?  
**Yes**
29. Does the school have a data protection policy?  
**Yes**
30. Has it been updated to take account of the introduction of a CCTV system?  
**Yes**
31. 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)?  
**Yes**
32. Has the right of access been communicated to staff, students and visitors?  
**Yes**



33. Has the school communicated its policy on the use of CCTV to staff, students and visitors and how has this been done?

***Yes. The policy and procedures are available on our website.***

34. How are new students and new staff informed of the school's policy on the use of CCTV?

***Through signage and induction of staff by nominated staff mentor.***

