

## **St Gabriel's Primary School CCTV System and its Data Management Policy**

A Closed Circuit Television System (CCTV) is installed in St Gabriel's School under the remit of the Board of Management.

### **Purpose of the Policy**

The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of the environs of premises under the remit of the Board of Management of St Gabriel's School.

### **Purpose of the CCTV System**

The CCTV system is installed internally and externally on 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 to deter crime, vandalism, theft, and bullying, as an aid to the promotion of high-quality Health and Safety standards including child protection and to the discharge of the school's duty of care within and/or in the external environs of the premises at all times.

### **Scope of this policy**

This policy applies to all staff, pupils, and visitors to St Gabriel's School. It relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

### **General Principles**

The Board of Management of St Gabriel's School, as the corporate body, has a statutory responsibility for the protection of the school property and equipment as well as providing a sense of security to its employees, students and invitees to its premises. St Gabriel's School owes a duty of care under the provisions of Health, Safety and Welfare legislation and utilises the CCTV system and its associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life in our school by integrating the best practices governing the surveillance of its premises.

The primary aim of the CCTV system in St Gabriel's School is to deter crime and vandalism and to assist in the protection and safety of the said property, its associated equipment and its pupils and staff.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy.

Information obtained through video monitoring may only be released when requested in writing, and authorised by the Principal, following consultation with the Chairperson of The Board of Management. It may also be released if requested by the Gardaí.

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

The industry code of practice for video monitoring prohibits monitoring based on the classifications contained in Equality and other related legislation e.g. gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the Traveller community.

Video monitoring of public areas, for security purposes, within St Gabriel's School is limited to areas that do not violate the reasonable expectation to privacy as defined by law.

Data from the CCTV system will be accessed and used in accordance with Data Protection Regulations.

**Cameras are located in the following areas:**

**Internal**

- The Reception/Lobby Area
- All Ground Floor Corridor Areas

**External**

- The Main Entrance Area
- At/on the soffits of all external wall areas covering points of entrance/exit, Yard Areas, and Perimeter Fencing.

Signage is erected at the school entrance advising that a CCTV System is in operation in at the school. The signage includes the name and contact details of the data controller as well as the specific purpose for which the CCTV cameras are in place.

Staff, pupils and parents/guardians are informed of the location and purpose of the CCTV system as outlined above. The right to access images captured by CCTV cameras shall be in accordance with the Data Protection Acts of 1998 and 2003, and as per St Gabriel's School Data Protection Policy.

**Data Protection**

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1998, 2003 and 2018. Under the Data Protection Acts a data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information in manual files or in a computerised form. The data controller in respect of images recorded and stored by the CCTV system in the school is the Principal on behalf of the Board of Management.

The personal data recorded and stored by the CCTV system will only be available to the data controller and will be used only for the purposes outlined in this Policy.

Individuals whose images are recorded and stored by the CCTV system shall have the right to request and receive a copy of personal data processed by the system. Such requests shall be made in writing to the data controller and shall be complied with within a maximum of 40 days. Personal data recorded by the CCTV system shall be retained for a maximum of 31 days. Thereafter it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in the Principal's and Secretary's Office area. Unauthorised access to those Offices is not permitted at any time. The Offices are secured by means of the Access Control System.

The following procedures shall be followed in the event that An Garda Síochána seeks to view or take a copy of CCTV footage from the school's CCTV systems:

1. The data controller shall satisfy himself/herself that there is an investigation underway
2. A request from An Garda Síochána must be made in writing on Garda Síochána headed notepaper.

All CCTV systems and associated equipment are required to be compliant with this Policy.

### **Responsibilities:**

The ***Board of Management*** will:

- Ensure that the CCTV Policy is in place, compliant with relevant legislation, to govern the use of CCTV in the school
- Ensure this Policy is reviewed regularly by the Board of Management.

The ***Principal*** will:

- Act as Data Controller on behalf of the Board of Management
- Ensure that the use of the CCTV system is used in accordance with this Policy as set down by the Board of Management
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school
- Ensure that all CCTV monitoring systems are compliant with this Policy
- Be responsible for the release of any information or material in compliance with this Policy
- Maintain a record of the release of any material recorded or stored on this system
- Provide a list of the CCTV cameras, their locations and the associated monitoring equipment and the capabilities of such equipment to the Board of Management for formal approval
- If required, approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events
- Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the school

- Advise the Board of Management to ensure that adequate signage, at appropriate and prominent locations, is displayed
- Ensure that external cameras are not intrusive in terms of their positions and views of residential housing and comply with the principle of 'reasonable expectation of privacy'
- Ensure that recorded material is retained for a period not longer than 31 days and will be erased unless required as part of a criminal investigation or court proceedings, criminal or civil, or other bona fide use as approved by the Board of Management
- Ensure that monitors are stored in a secure place with access by authorised personnel only.

### **Links to Other Policies and to Curriculum Delivery**

All school policies are consistent with one another, within the framework of the overall School Plan. Relevant school policies already in place, being developed or reviewed, are examined with reference to the CCTV Policy and any implications which it has for them are addressed.

The following policies are among those considered:

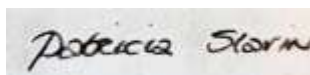
- Data Protection Policy
- Child Protection Policy
- Anti-Bullying Policy
- Code of Behaviour
- Mobile Phone Code
- ICT Acceptable Usage Policy
- Health and safety

The CCTV Policy has been developed mindful of the school's obligation under Data Protection Legislation.

### **Ratification and review:**

This policy was ratified by the Board of Management in April 2018 and will be reviewed as necessary and at least within a four-year period.

**Signed:**



Patricia Slavin, Chairperson of Board of Management

**Date:** 30/11/22