

# **CCTV Systems & Data Management Policy**

### **Purpose of the Policy**

Closed Circuit Television System is installed in Gurraneasig National School. The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of the premises and its environs under the remit of the Board of Management of Gurraneasig National School. This incorporates the entrance areas to the school building and the main thoroughfare of the Halla and Corridor.

## **Purpose of the CCTV System**

The CCTV system is installed internally in the school premises for the purpose of enhancing security of the building and its associated equipment as well as to deter crime, vandalism and theft.

### Scope of this policy

This applies to all personnel in and visitors to Gurraneasig National 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 Gurraneasig National School, as the corporate body, has a statutory responsibility for the protection of the school property and equipment.

The primary aim of the CCTV monitoring of Gurraneasig National School premises is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials, outside of school opening hours.

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 authorised by the Principal, following consultation with the Chairperson of The Board of Management.

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 Educational and related legislation.

Video monitoring of public areas, for security purposes, within the school campus, 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

- Halla; trained on Main Entrance
- Corridor; trained on Porch Entrance

These locations have been selected to give an overview of the main entrance areas and thoroughfares should access be gained from a secondary location.

Signage is erected at the entrance of the school. The signage includes the name and contact detail of the data controller as well as the specific purpose for the CCTV camera.

Staff, pupils and parents/guardians will be 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. This policy is available on the school website.

CCTV recording will only be enabled outside of normal school operating hours.

### **Data Protection**

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts. 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 and live feed will only be available to the data controller and will be used only for the purposes outlined on the signage. 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 her absence. All access to CCTV and live stream is password protected. The CCTV system shall not be used to monitor staff performance.

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 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. Thereafter it will be deleted automatically.

If an Garda Síochána request CCTV images for a specific investigation; such requests will be authorised by the Principal following consultation with the Chairperson of the BOM and Management Body if deemed necessary.

All CCTV systems and associated equipment will be required to be compliant with this policy.

#### Responsibilities:

The Board of Management will:

- Ensure that a 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 the policy set down by the Board of Management.
- Oversee and coordinate the use of CCTV monitoring for 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.
- 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, as appropriate at prominent locations, is displayed.
- Ensure that recorded material is retained for a period not longer than 28 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
- ICT Acceptable Usage Policy

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

# Monitoring the implementation of the Policy

Staff and Board of Management members will satisfy themselves on an on-going basis that the actions/measures set down under the Policy are being implemented.

# Reviewing and evaluating the Policy

Ongoing review and evaluation of this Policy will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills), legislation and feedback from parents/guardians, pupils, school staff and others. The Policy will be revised as necessary in the light of such review and evaluation and within the framework of school planning.

Practical indicators that will be used to gauge the impact and effectiveness of the policy will include the extent to which:

• Staff and parents/guardians are aware of the policy

- Requests for access to personal data are dealt with effectively
- Personal data records are held securely

Ratified by Board of Management:

Signed Many Disso.

Chairperson, Board of Management

7/10/24 Date