



CCTV Policy

Introductory Statement

Closed Circuit Television Systems (CCTVS) are installed in Rathgarogue NS. New CCTV systems will be introduced in consultation with staff, the board of management and the Parents' Association. Where systems are already in operation, their operation will be reviewed regularly in consultation with staff, the Board of Management and the Parents' Association.

Purpose of CCTV 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 Rathgarogue NS. CCTV systems are installed (both internally and externally) in 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 in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at Rathgarogue NS is intended for the purposes of:

- Protecting the school buildings and school assets, both during and after school hours.
- Promoting the health and safety of staff, pupils, and visitors.
- Preventing bullying.
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- Supporting An Garda Síochána in a bid to deter and detect crime.
- Assisting in identifying, apprehending, and prosecuting offenders.
- Ensuring that the school rules are respected so that the school can be properly managed.

The use of the personal data collected by the CCTV will be limited to that original purpose.

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 in rented premises, the school will ensure that CCTV systems are operated only in a way that is compatible with the provisions of this policy.

General Principles

Rathgarogue NS owes a duty of care under the provisions of the Safety, Health and Welfare at Work Act 2005, the Data Protection Act 2018, General Data Protection Regulations 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 Board of Management. 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. 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 the Code of Behaviour, Bí Cinealta Policy, Child Safeguarding Policy, 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 individual's reasonable expectation of 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 Rathgarogue NS. Recognisable images captured by CCTV systems are "personal data". They are therefore subject to the provisions of Data Protection legislation. As with any processing of personal data, the recording of identifiable images of persons must have a legal basis. The use of CCTV has been considered in light of the obligations imposed by data protection legislation on data controllers, and implemented in accordance with the principles of data protection. The data controller has justified the use of a CCTV system as both necessary to achieve their given purposes and proportionate in its impact upon those who will be recorded.

Justification for Use of CCTV Cameras

The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the Board of Management. 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. In other areas of the school where CCTV has been installed, e.g., main entrance, Halla Mór, playground, main gate, and at the oil tank, the Principal has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

Location of Cameras

Rathgarogue 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 minimise recording of passers-by or of another person's private property. The placement of cameras in areas where people have greater expectations of privacy, such as restrooms is avoided..

Covert Surveillance

Rathgarogue NS will not engage in covert surveillance. Covert surveillance is generally unlawful and normally only permitted on an exceptional case-by-case basis where the data are kept for the purposes of preventing, detecting, investigating offenses, or apprehending or prosecuting offenders. 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 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. The location of CCTV cameras will also be indicated to the Board of Management. Adequate signage will be placed throughout the school to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to Rathgarogue NS. A sign at all entrances will normally suffice indicating the purpose of the CCTV system and the identity and contact details of the data controller. Signage should provide individuals with, either directly or in a way the individual can easily access, information including:

- The identity and contact details of the data controller (Rathgarogue NS).
- The contact details for the data protection officer, The Principal 051 424779..
- The purposes for which data are processed (as outlined in this policy).
- The legal basis for the processing (legitimate interests of the school).
- Any third parties to whom data may be disclosed (e.g., An Garda Síochána, HSE, insurance company).
- The security arrangements for the CCTV footage.
- The retention period for CCTV footage, maximum 28 days.
- The existence of data subject rights and the right to lodge a complaint with the Data Protection Commission (DPC).

Storage and Retention

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. This retention period takes into account that data should be kept for no longer than is necessary for the original purpose. The images/recordings will be stored in a secure environment. Access will be restricted to authorized personnel. 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. The CCTV Hard drive will be stored in a secure environment with access restricted to the Principal, Deputy Principal, and Chairperson of the Board of Management. Data controllers are obliged to implement technical and organisational measures to ensure that personal data are kept secure from any unauthorised or unlawful processing and accidental loss, destruction or damage.

Access

Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that footage and equipment will not be permitted at any time. Access to the CCTV system and stored images will be restricted to the Principal, Deputy Principal, and Chairperson of the Board of Management. In relevant circumstances, CCTV footage may be accessed:

- By An Garda Síochána where Rathgarogue NS (or its agents) are required by law to make a report regarding the commission of a suspected crime.
- 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 school property.
- To the HSE and/or any other statutory body charged with child safeguarding.
- To data subjects (or their legal representatives), pursuant to an access request where the time, date, and location of the recordings is furnished to Rathgarogue NS.
- To individuals (or their legal representatives) subject to a court order.
- To the school insurance company where the insurance company requires the same in order to pursue a claim for damage done to the insured property.

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 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 Principal. The school may charge a reasonable fee for responding to such a request and must respond within 25 working days. A person should provide all the necessary information to assist Rathgarogue NS in locating the CCTV recorded data, such as the date, time, and location of the recording.

Responsibilities

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within Rathgarogue NS.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- 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.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. **Note:** Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorized criminal investigations by An Garda Síochána.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- 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.
- Co-operate with the Health & Safety Officer of Rathgarogue NS in reporting on the CCTV system in operation in the school.
- 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".
- Ensure that monitoring hard drives are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on hard drives 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 Chairperson of the Board.
- 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.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc., and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.
- Ensure that where An Garda Síochána requests to set up mobile video equipment for criminal investigations, legal advice has been obtained and such activities have the approval of the Chairperson of the Board.

Implementation & Review

This policy will be reviewed and evaluated as necessary. 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, Audit units, national management bodies, legislation, and feedback from parents/guardians, students, staff, and others).

Data Protection Officer (DPO)

The Principal, The Data Protection Officer can be contacted at 051 424779 & schooloffice@rathgaroguens.com. The DPO should be consulted at all stages of the implementation and review of this policy.

Signed:



Brendan Kelly
Chairperson, Board of Management

Date: 9/9/25

This policy reflects the principles outlined in the "CCTV Guidance Data Controllers November 2023" and draws upon the existing CCTV policy of Rathgarogue NS to create a framework suitable for Rathgarogue NS.