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CCTV Policy

Introduction

CCTV systems are in place at Scoil Náisiúnta Loch Guir and their usage will be reviewed regularly with input from staff, the Board of Management, and the Parents' Association.

New systems will be introduced in consultation with these groups.

Purpose of the Policy

The purpose of this policy is to regulate the use of CCTV systems and its associated technology in the monitoring of the external environ of the premises under the remit of the *B.O.M. of Scoil Náisiúnta Loch Guir*.

CCTV monitors the school campus externally to enhance security, promote safety, uphold school rules preventing misbehaviour, support the Gardaí in deterring crime and anti-social behaviour, identify offenders leading to apprehension and prosecution — all while maintaining vigilance among students, teachers, and guests; and protecting the school buildings and school assets, both during and after school hours;

Scope

This policy governs the use and location of CCTV, including monitoring, recording, and use of footage. If classes or activities take place in rented premises with CCTV, Scoil Náisiúnta Loch Guir will ensure that the systems comply with this policy.

General Principles

Scoil Náisiúnta Loch Guir's BOM has a statutory responsibility to protect its property and provide security to its community. CCTV systems are used to enhance security and comply with the Safety, Health and Welfare at Work Act 2005.

The system must be used ethically and legally, and not for monitoring employee performance.

CCTV footage can only be released with authorization from the Principal and Chairperson of the BOM, and requests from An Garda Síochána will be recorded and reviewed by legal counsel.

The system must comply with all school policies and legislation, and cannot be used to monitor individuals based on their characteristics or violate their privacy.

Any footage obtained in violation of this policy cannot be used in disciplinary proceedings.

All CCTV systems must comply with this policy and the Data Protection Acts 1988 to 2018.

Justification for Use of CCTV

To adhere to Data Protection laws, Scoil Náisiúnta Loch Guir's BOM ensures CCTV captures adequate, relevant, non-excessive data. Justified uses include securing school grounds via perimeter monitoring to spot trespassers, damage to school property, or unauthorized removal of items from the school campus.

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

In other areas, like hallways and entrances, the Principal must prove a security or safety risk exists before installing CCTV, and the system must be proportionate to the issue.

Location of Cameras

Camera placement is crucial, as CCTV monitoring in areas with expected privacy is hard to justify. Scoil Náisiúnta Loch Guir's BOM selects camera locations that are least intrusive to protect privacy. External cameras are positioned to avoid recording passersby or private property.

CCTV at Scoil Náisiúnta Loch Guir monitors and records public areas for:

- Protecting school buildings and property, including perimeter, entrances, lobbies, and special storage areas

- Monitoring access control systems and recording restricted areas
- Verifying security alarms for intrusion and external threats
- Patrolling public areas such as parking lots, entrance/exit gates, and traffic control
- Assisting An Garda Síochána in criminal investigations for robbery, burglary, and theft.

Covert Surveillance

Scoil Náisiúnta Loch Guir does not conduct covert surveillance.

If An Garda Síochána requests covert surveillance on school premises, a judge's consent may be required. The school will request this in writing and seek legal advice from the Data Protection Commissioner.

Notification – Signage

The Principal will provide a copy of the CCTV Policy upon request to staff, students, parents, and visitors. The policy includes the purpose and location of CCTV monitoring, a contact number for inquiries, and usage guidelines.

The B.O.M. will be informed of the camera locations. Signage will be placed at each location of a CCTV camera and at the entrance of Scoil Náisiúnta Loch Guir property, including the data controller's name and contact details and the specific purpose(s) of each camera. Signage will be placed at appropriate locations, such as external doors, school gates, reception areas, and near each internal camera.



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 *Scoil Náisiúnta Loch Guir* 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 *B.O.M* of *Scoil Náisiúnta Loch Guir*.**

**For more information contact Denis Kennedy, Principal Teacher,
(061) 385004**

Storage and Retention

Data Protection law requires data to be kept only for necessary purposes, and a data controller must justify the retention period. For a standard CCTV system, retention beyond 28 days is difficult to justify, except for specific images/recordings related to an investigation or prosecution of an issue such as a break-in or theft.

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

CCTV images/recordings will be stored securely with restricted access to authorized personnel. The B.O.M. is responsible for supervising access and maintenance of the system, but the Principal may delegate administration to another staff member. In certain circumstances, authorized individuals such as the Gardaí, Deputy Principal, teaching staff, Department of Education/HSE representatives, or a student's parent may view recordings to achieve the system's

objectives. Access to recordings will be limited to authorized individuals on a need-to-know basis. A log of access will be kept.

Access

Secure storage devices will have restricted access to authorized personnel, who lock the area when unoccupied.

A log of access to recordings/images will be maintained. Only the Principal has access authority over the CCTV system and stored images.

Relevant situations where access may be granted to CCTV footage include:

1. To An Garda Síochána for reporting crimes or suspect behaviour
2. Following Garda requests after a crime or suspicion of a crime
3. To HSE and child protection agencies
4. Establishing facts about school misbehaviour, in which case parents will be informed
5. Subjects' access requests where specified times, dates, and locations are provided to Scoil Náisiúnta Loch Guir
6. To individuals subject to a court orders
7. For the purposes of a school insurance claim

The CCTV system may be accessed remotely via the SecureComm app, by the Principal, strictly for security purposes.

Requests by *An Garda Síochána*

Authorized release of information via CCTV monitoring occurs under the Principal's direction, consulting the Board of Management Chairperson first. If An Garda Síochána seeks CCTV images for a specific investigation, they may require a warrant. Therefore, any such request by An Garda Síochána should be made in writing, and the school should promptly seek legal guidance.

Access Requests

A person can request a copy of their recorded image if it exists and is not deleted, and no exemption/prohibition applies. If the image identifies another person, it can only be released if redacted/anonymized. To access their data, a subject must apply in writing to the Principal. The school must respond within one month.

Access requests can be made to the following:

Denis Kennedy,
An Príomhoide,
Scoil Náisiúnta Loch Guir,
Patrickswell,
Bruff,
Co. Limerick
V35 XE27

A person should provide all the necessary information to assist *Scoil Náisiúnta Loch Guir* 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 USB file or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

Responsibilities

The Principal of Scoil Náisiúnta Loch Guir will:

- Implement CCTV policy set by the BOM
- Oversee and coordinate CCTV monitoring for safety and security
- Evaluate existing CCTV systems for compliance
- Maintain high standards and protections
- Review camera locations and release information in compliance with policy
- Keep a record of access and release of recorded materials
- Ensure no duplication of monitoring recordings
- Ensure fixed and temporary cameras conform to policy
- Consider feedback and complaints regarding privacy
- Ensure no breach of privacy expectations
- Cooperate with the Health & Safety Officer
- Ensure external cameras comply with privacy principles
- Store digital recordings securely and erase after 28 days
- Use the zoom facility on CCTV only with a second person present
- Monitor suspicious behaviour, not individual characteristics
- Not infringe on reasonable privacy expectations
- Obtain legal advice and BOM approval for mobile video equipment usage by An Garda Síochána on school premises

Security Companies

The school CCTV system is controlled by a security company, GTA Systems, contracted by the school's B.O.M. The following applies:

The school has a Third Party Service Agreement with this security company that details monitored areas, data storage, security standards, and verification procedures. The agreement states that the security company will assist the school with subject access requests within one month.

Security companies are data processors and must follow data controller instructions and have appropriate security measures to prevent unauthorized access, alteration, disclosure, or destruction of data. Staff of the security company are aware of their obligations. See the agreement for more guidance.

Implementation and Review

This policy will be periodically reviewed and evaluated, considering changing information or guidelines from relevant sources. e.g. from the Data Protection Commissioner, An Garda Síochána, Department of Education, Audit units (internal and external to the school), national management bodies, legislation and feedback from parents/guardians, students, staff and others.

The policy applies from the adoption date by the B.O.M. The Principal will monitor policy implementation.

Ratification

Date:

28th February 2024

Signed:

Rev. Fr. Edward Cleary

Chairperson,

Board of Management,

Scoil Náisiúnta Loch Guir