

CCTV Policy

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Introduction

Closed Circuit Television Systems (CCTVS) are installed in Kilbonane National School

New CCTV systems will be introduced in consultation with staff, the BoM and the Parents' Association. Where systems are already in operation, 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 Kilbonane National School.

CCTV systems are installed (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 in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the school is intended for the purposes of:

1. protecting the school buildings and school assets after school hours;
2. reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
3. supporting the Gardaí in a bid to deter and detect crime
4. assisting in identifying, apprehending and prosecuting offenders

Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

General Principles

The BoM of Kilbonane 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 Board of Management of Kilbonane 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.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the BoM of Kilbonane NS. Recognisable images captured by CCTV systems are personal data. They are therefore subject to the provision of the Data Protection Acts 2008 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 Kilbonane 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.

IMPORTANT: The school's CCTV system will not be used to monitor the school property (or teacher/student activity) during normal school hours. This includes drop-off/collection and usual congregation/dispersal times.

CCTV will be active:

- from 3.30pm each day to 8.30am the following morning (Monday to Friday during normal school calendar)
- on a 24-hour basis at weekends/holidays

Location Of Cameras

The location of cameras is a key consideration. The BoM of Kilbonane 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 Kilbonane NS may include the following:

- Protection of school buildings and property: The building's perimeter, all-weather pitch, front and rear entrances
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Parking areas, Main entrance/exit doors/gates
- Criminal Investigations (carried out by An Garda Síochána): Robbery, burglary and theft surveillance

Covert Surveillance

Kilbonane 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 and guidelines for its use. The location of CCTV cameras will also be indicated to the BoM.

Adequate signage will be prominently displayed at the entrance to Kilbonane National School property.



WARNING

CCTV cameras in operation

The BoM of Kilbonane NS has decided that the appropriate locations for cameras are:

- at the front entrances to the premises
- at the rear entrance to the premises
- at the rear of the school (to monitor the school's all-weather pitch)

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 and/or representatives of the HSE). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Access

The storage device (1TB Hard Drive within the NVR) 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 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.

In relevant circumstances, CCTV footage may be accessed:

1. By An Garda Síochána where the BoM of Kilbonane NS is 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 Kilbonane NS property, or

3. By the HSE and/or by any other statutory body charged with child safeguarding; or
4. To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Kilbonane NS, or
5. To individuals (or their legal representatives) subject to a court order
6. To the school'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 request 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.

Responsibilities

The Principal will:

1. Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the BoM of Kilbonane NS
2. Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes
3. Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
4. Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
5. Maintain a record of access (e.g. an access log) to or the release of any material recorded or stored in the system
6. Ensure that monitoring recorded material are not duplicated for release
7. Ensure that the perimeter of view from fixed location cameras conforms to this policy
8. 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"
9. Ensure that monitoring digital recordings are stored in a secure place with access by authorised personnel only
10. Ensure that images/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
11. Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
12. 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 , Audit units (internal and external to the school), national management bodies, legislation and feedback from parents/guardians, students, staff and others.

The date from which the policy will apply is the date of adoption by the BoM. Implementation of the policy will be monitored by the Principal of the school.

Ratified by the BOM: 16 June 2025

The above policy will be reviewed when and if necessary.