



Loreto Secondary School

Balbriggan

Closed Circuit Television Policy

Introduction

Loreto Secondary School, Balbriggan, is committed to the care of its students, staff and wider school community. This duty of care is at the core of the school's characteristic spirit and responds also to its statutory responsibility under the provisions of the Safety, Health and Welfare at Work Act 2006 and associated legislation.

To this end, the Board of Management has chosen to use Closed Circuit Television (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.

Rationale for the 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 Loreto Secondary School, Balbriggan. CCTV surveillance at the school 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.
- Supporting the Gardaí 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.
- Helping to identify or prevent incidents of bullying, in tandem with other pastoral interventions.
- Reducing the incidence of anti-social behaviour (including theft).

General Operations of the CCTV System

The use of the CCTV system at Loreto Secondary School, Balbriggan is 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/student 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 and in accordance with the Data Protection Policy, available on the school website. CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Dignity in the Workplace Policy, Codes of Practice for

dealing with complaints of Bullying and Harassment and other relevant policies, 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 legislations 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 to 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 attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Board of Management of Loreto Secondary School, Balbriggan. Recognisable images captured by CCTV systems are personal data. They are therefore subject to the provisions of the Data Protection Acts 1988 and 2003 and are managed in accordance with the school's Data Protection Policy.

Location of Cameras

Reasons for the use of CCTV Video Monitoring and Recording of Public Areas at Loreto Secondary School, Balbriggan include the following:

- Protection of school buildings and property: the building's perimeter, entrances and exits, locker areas, receiving areas for goods/services.
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Parking Areas, Main entrance/exit gates
- Criminal Investigations (carried out by An Garda Siochana) Robbery, burglary and theft surveillance.
- Loreto Secondary School, Balbriggan does not engage in covert surveillance

Notification – Signage

This CCTV Policy is available to staff, students, parents and visitors to the school via the school's website. Adequate signage will be placed at each location at which a CCTV camera is sited. Adequate signage will also be prominently displayed at the entrance to the schools' and contact details of the purpose(s) for which the data controller as well as the specific CCTV camera is in place in each location. An example of this school's signage is displayed hereunder.



Storage and Retention

Section 2(1)(c)(iv) of the Data Protection Acts requires that data not be kept for longer than is necessary for the purposes for which it was obtained. At Loreto Secondary School, Balbriggan, this period of retention is twenty-eight (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.

The images/recordings are stored in a secure environment with a log of access kept. 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. In certain circumstances, other individuals may also view the recordings in order to achieve the objectives set out above (such individuals may include the Gardai, the Deputy Principals, the relevant Year Head, other members of the teaching staff, representatives of the Department of Education and Skills, representatives of the HSE and/or the parent/guardian of a recorded students). When CCTV recordings are being viewed, access will be limited to authorized individuals on a need-to-know basis.

Access Requests

On written request to the School Principal, any person whose image has been recorded has a right to be given a copy of the information recorded, 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. (See Data Protection Policy Appendix 3). Where the image/recording identifies another individual, those images may only be released when they can be redacted so that the other person is not identifiable.

A Data Subject should provide all the necessary information to assist 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 his/her data, the school may provide a still/series of still pictures or USB stick with relevant images. However, images of other individuals will be obscured before the data is released.

Review

The policy will be reviewed and evaluated every three years, or more frequently if needed to reflect changing legislation or guidelines (e.g. from the Data Protection Commissioner, An Garda Síochána, Department of Education and Skills, etc).

Signed:  Chairperson, Board of Management

Signed:  Principal/Secretary, Board of Management

This policy was ratified by the Board of Management on 18th October 2021