



St. Patrick's School. Drumcondra, D09XH2

Scoil Phadraig, Droim Conrach, Ath Cliath D09 XH52

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Charity number:20116453

CCTV Policy

INTRODUCTION

A Closed Circuit Television System (CCTV) is installed on the grounds of St Patrick's BNS. The CCTV system has been introduced in consultation with staff, the board of management and the parent association. The operation of the system will be for a limited purpose i.e. security and will be reviewed regularly in consultation with staff, the board of management and the parent's association.

PURPOSE OF POLICY

The purpose of this policy is to regulate the use of the CCTV system and its associated technology in monitoring and recording the environs of the premises under the remit of the Board of Management at St Patricks BNS.

The CCTV system is installed externally on the school's premises and will be monitored 24 hours per day, 7 days per week, 52 weeks per year.

Recording will occur between the hours of 5pm and 7am Monday-Friday, and at all hours at the weekend, outside term time and during holiday periods.

The CCTV system is implemented in a proportionate manner and is intended for the purposes of enhancing the safety of individuals on school grounds as well as protecting the school buildings and school property by preventing the incidence of crime and anti-social behaviour (including theft and vandalism).

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

St Patricks BNS has a statutory responsibility for the protection of its property, as well as providing a sense of security to its employees, students and invitees to its premises. The *Board of Management* owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation, and utilises external CCTV systems and their associated monitoring and recording equipment as an added mode of security to prevent trespass and/or anti-social behaviour. 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, or pupil's behaviour.

The Data Controller for the CCTV system is Dublin City University (DCU).

Any law enforcement request for information obtained through the CCTV system may only be released when authorised by DCU, usually for the purpose of preventing, detecting, investigating or prosecuting a criminal offence.

CCTV monitoring and recording of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school and in compliance with [DCU's Data Privacy Policy](#). Video monitoring and recording of public areas for security purposes within the school grounds is limited to uses that do not violate the individual's reasonable expectation of privacy.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Board of Management. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the [Data Protection Act 2018](#).

JUSTIFICATION FOR USE OF CCTV

Section 2 (1) (c) (iii) of the Data Protection Act requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that St Patrick's BNS 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 Board of Management. The system is intended to monitor the school grounds

throughout the day, and record images after school hours, which may capture images of intruders or individuals damaging property and or anti social behaviour.

LOCATION OF CAMERAS

The Board of Management of the School has endeavoured to select locations for the installation of CCTV cameras which will best serve the object of the policy but which will have a minimal effect on an individual's right to privacy. Cameras are positioned in such a way as to prevent or minimise monitoring and/or recording of pupils/staff, passers-by and/or of another person's private property.

While CCTV systems will be monitored 24 hours per day, 7 days per week, 52 weeks per year. Recording of images by the CCTV systems on the school grounds will occur between the hours of 5pm and 7am Monday-Friday, and at all hours at the weekend and outside term time and during holiday periods.



COVERT SURVEILLANCE

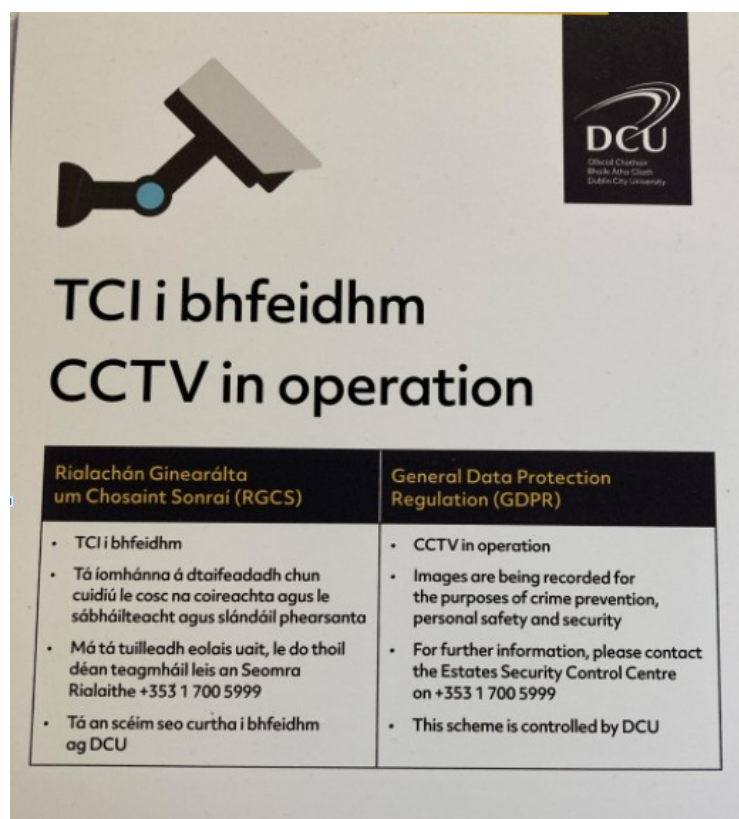
The school will not engage in covert surveillance.

Where An Garda Síochána requests to carry out covert surveillance on school premises, such covert surveillance may require a judicial Order. Accordingly, any such request made by An Garda Síochána will be requested in writing and the school will seek legal advice and will consult with DCU as the Data Controller.

NOTIFICATION – SIGNAGE

The Principal will make available a copy of this CCTV Policy on request to staff, students, parents and visitors to the school. This policy will be shared on the school website. This policy describes the purpose and location of CCTV, a contact number for those wishing to discuss CCTV (01 8372714) along with guidelines for its use.

The location of CCTV cameras will also be indicated to the Board of Management. Adequate signage will be placed at each location in which a CCTV camera is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance. Signage shall include the name and contact details of the Data Controller i.e. Dublin City University.



The image shows a white rectangular sign for CCTV in operation. At the top left is a black icon of a CCTV camera. At the top right is the DCU logo, which includes the text 'DCU', 'General Chamber', 'Brick Arts Centre', and 'Dublin City University'. Below the icon and logo, the text reads 'TCI i bhfeidhm' and 'CCTV in operation'. The sign is divided into two columns of text, each with a header in a black box. The left column header is 'Rialachán Ginearálta um Chosaint Sonraí (RGCS)' and the right column header is 'General Data Protection Regulation (GDPR)'. Both columns contain a list of bullet points.

Rialachán Ginearálta um Chosaint Sonraí (RGCS)	General Data Protection Regulation (GDPR)
<ul style="list-style-type: none">• TCI i bhfeidhm• Tá iomhánna á dtaifeadadh chun cuidiú le cosc na coireachta agus le sábháilteacht agus slándáil phearsanta• Má tá tuilleadh eolais uait, le do thoil déan teagmháil leis an Seomra Rialaithe +353 1 700 5999• Tá an scéim seo curtha i bhfeidhm ag DCU	<ul style="list-style-type: none">• CCTV in operation• Images are being recorded for the purposes of crime prevention, personal safety and security• For further information, please contact the Estates Security Control Centre on +353 1 700 5999• This scheme is controlled by DCU

STORAGE AND RETENTION

Data Protection legislation states that data “shall not be kept for longer than is necessary for” the purposes for which it was obtained. 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 in DCU 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 DCU, in consultation with the Principal. In certain circumstances (such as investigating or prosecuting a criminal offence on school property) the recordings may also be viewed by the Gardaí as per DCU's internal procedures.

ACCESS

Access to any soft copies of recorded footage, and the monitoring equipment itself, is managed by DCU. A log of access to soft copies and/or monitoring equipment will be maintained and stored by DCU.

CCTV footage may be requested in circumstances as follows:

1. By An Garda Síochána where the School 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; or
3. To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings are furnished.

Requests by An Garda Síochána

Information obtained through video recording will only be released to **An Garda Síochána** when authorised by DCU. Such requests should be made in writing. If information shared with An Garda Síochána derives from video monitoring during the school day, outside the hours of recordings, the school Principal will be notified in advance by DCU, and the Principal will formally advise the Board of Management.

Data Subject Access requests

On request, any person whose image has been recorded has a right to be given a copy of the recorded personal data 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 to the DCU [Data Protection Unit](#).

RESPONSIBILITIES

Dublin City University and The Board of Management

1. Ensure that the use of CCTV systems is implemented in accordance with DCU's Data Privacy Policy and that of The Board of Management of St Patrick's BNS.
2. Oversee and coordinate the use of the CCTV system for safety and security purposes. Monitoring will be 24 hours per day, 7 days per week, 52 weeks per year. Recording will occur between the hours of 5pm and 7am Monday-Friday, and at all hours at the weekend and outside term time and during holiday periods.
3. Ensure that the CCTV monitoring and recording at St Patrick's BNS is consistent with the highest standards and protections and data protection legislation.
4. 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.
5. Ensure that adequate signage at appropriate and prominent locations is displayed as detailed above.


Dublin City University

1. Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with the DCU Data Privacy Policy.
2. Maintain a record of access (e.g. an access log) to the release of any material recorded or stored in the CCTV system.
3. Ensure that the perimeter of view from fixed location cameras conforms to this policy.
4. 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."
5. Ensure that recordings are stored in a secure place with access by authorised personnel only.
6. Ensure that images recorded 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 DCU in compliance with DCU Data Privacy Policy.
7. Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.


IMPLEMENTATION & REVIEW

This policy will be reviewed annually. 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 and Skills, 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 Board of Management. Implementation of the policy will be monitored by the Principal of the school.

Signed by: 

Chairperson

Signed by: 

Principal

Date: 29th May 2023

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of this policy.

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place, on a limited set of monitors. The images may then be recorded.

The Data Protection Acts – The Data Protection Acts 1988, 2003 & 2018 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation.

Data – information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data.

Data Processing – performing any operation or set of operations on data, including:

1. Obtaining, recording or keeping the data
2. Collecting, organising, storing, altering or adapting the data
3. Retrieving, consulting or using the data
4. Disclosing the data by transmitting, disseminating or otherwise making it available
5. Aligning, combining, blocking, erasing or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller – a person who (either alone or with others) controls the contents and use of personal data.

Monitoring - the act of using closed-circuit television (CCTV) systems to observe and oversee activities in a specific area or location. CCTV cameras are strategically placed to capture video footage of the surroundings, and this footage is then monitored by individuals or automated systems in real-time or recorded for later review.

Recording - refers to the process of capturing and storing video footage from closed-circuit television (CCTV) cameras.

APPENDIX 2
PRIVACY IMPACT ASSESSMENT



Data Protection Impact Assessment

This document records the schools' DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

Submitting controller details

Name of controller	Dublin City University
Subject/title of Data Protection Officer (DPO)	Martin Ward, DCU
Name of controller contact /DPO	Martin Ward, DCU

Step 1: Identify the need for a DPIA

External closed circuit television cameras (CCTV) on the school site will.

- a) To act as a deterrent to any trespass, anti-social behaviour etc against persons or property, throughout the day and night, at weekends and during holiday periods.
- b) Assist in identifying persons who have committed an offence.
- c) Maintain a safe environment for members of our school community. DCU's CCTV system is implemented in a proportionate manner as necessary to protect individuals and property against trespass and anti-social behaviour, and consequently for the safety and security of staff, pupils and visitors to the DCU campuses.

Step 2: Describe the processing

Whilst CCTV footage is monitored by DCU security staff, access to recorded footage is strictly limited to authorised personnel.

Monitoring by DCU will occur during daytime and nighttime hours. Recording by DCU will occur between the hours of 5pm and 7am Monday to Friday, and at all hours at the weekend

CCTV system will be external only. There is no need for internal surveillance.

Footage is retained for 28 days, except where incidents or accidents have been identified in which case such footage is retained specifically in the context of an investigation of that issue. Footage will be destroyed by DCU, in line with its Data Retention Policy.

CCTV footage is not disclosed to third parties except where disclosure is required by law, on a valid law enforcement request, (such as for the purpose of preventing, detecting or investigating alleged offences) and in such instances

Signage indicating that CCTV is in use is displayed prominently throughout the DCU campus, and signage will also be included on the school premises.

For information on CCTV operations at DCU please contact the Director of Estates.

The scope of the processing:

CCTV monitoring will be 24 hours per day, 7 days per week, 52 weeks per year.

Recording will occur between the hours of 5pm and 7am Monday-Friday, and at all hours at the weekend

Data will be retained for 28 days, and then deleted.

The geographical area covered will be the perimeter walls and gates adjacent to Millbourne Avenue, and the area adjacent to Drumcondra Road (where school bike racks are positioned).



The context of the processing:

Recording will cover the perimeter areas, and access gates. Parents, pupils and school staff may be included in the processing (i.e monitoring). There are no prior concerns over this type of processing.

There is currently CCTV throughout the DCU St. Patricks Campus, whereby parents, pupils and staff may also be included in the processing.

Purposes of the processing:

- a) To act as a deterrent to any trespass and anti-social behaviour against persons or property.
- b) Assist in identifying persons who have committed an offence.
- c) Maintain a safe environment for members of our school community.
- d) To provide the intended effect of safety and security for individuals.

Step 3: Consultation process**Consider how to consult with relevant stakeholders:**

Initial discussion with DCU security

Initial letter to staff and parents

Discussion with pupils

Discussion and agreement between Board of Management of the St. Patricks Boys National School and the DCU Data Protection Unit.

Notify Insurance company

Step 4: Assess necessity and proportionality

There is a lawful basis for processing i.e security, safety.

The processing will achieve our purpose.

There is no scope for "function creep."

Step 5: Identify and assess risks

<u>No risks identified</u>	Likelihood of harm	Severity of harm	Overall risk
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Step 6: Identify measures to reduce risk**Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5**

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
N/A				

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:		

<p>Data Protection Officer (DPO) and Estates Office advice provided.</p>	<p>Provided by DPO Martin Ward, Brian O'Toole of DCU Estates, and DCU security - Friday 24th February 2023.</p> <p>Martin Ward - March/April 2023.</p>	<p>Monitoring 24 hours per day, 7 7 days per week, 52 weeks per year.</p> <p>Recording will occur between the hours of 5pm and 7am Monday-Friday, and at all hours at the weekend.</p>
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