



**CCTV Systems  
&  
Data Management Policy**

**Our Lady of Good Counsel  
Girls' School  
Johnstown  
Dun Laoghaire**

**September 2025**

# **CCTV Systems & Data Management Policy**

**Our Lady of Good Counsel Girls' Primary School**



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The Closed Circuit Television System (CCTV) is installed in Our lady of Good Counsel Girl's School under the remit of the Board of Management.

### **Purpose of the Policy**

The purpose of the policy is to regulate the use of CCTV and its associated technology in the monitoring of the premises and environs under the remit of the Board of Management of Our Lady of Good Counsel Girls' School.

### **Purpose of the CCTV System**

The CCTV system is installed internally and externally on the school 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 to deter crime, vandalism and theft, and anti-social behaviour.

### **Scope of this Policy**

This applies to all staff, pupils and visitors to Our Lady of Good Counsel Girls' School. It relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

### **General Principles**

The primary aim of the CCTV monitoring of Our Lady of Good Counsel Girls' School premises is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy.

Information obtained through video monitoring may only be released when authorized by the Principal, following consultation with the Board of Management. This information may only be obtained if it is in relation to the above-mentioned function, i.e. a request for information from An Garda Síochána.

CCTV monitoring of public areas, for security purposes, will be conducted in a manner consistent with all existing policies adopted by the Board of Management including the provisions set out in Equality and other Education related legislation.

The industry code of practice for video monitoring prohibits monitoring based on the classifications contained in Equality and other related legislation, e.g. gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the Traveller Community.

Video monitoring of public areas, for security purposes, within the school campus, is limited to areas that do not violate the reasonable expectation to privacy as defined by law.

Data from the CCTV system will be accessed and used in accordance with Data Protection Regulations.

### **Camera Locations**

There are 16 cameras covering the interior and exterior of the school campus. Camera locations are available on request from the school principal.

#### Internal:

- The entrances to the school building and The Meadow building.

#### External:

- The school campus.

Signage is erected at the school entrance and The Meadow advising that a CCTV system is in operation in the school.

### **Data Protection**

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1998 and 2003. Under the Data Protection Acts a data controller is the legal person who controls and is responsible for the keeping and use of personal information in manual files or in computerised form. The data controller in respect of images stored by the CCTV system in the school, is the Principal on behalf of the Board of Management.

The personal data recorded and stored by the CCTV system will only be available to the data controller and will be used only for the purposes outlined in this Policy.

Individuals whose images are recorded and stored by the CCTV system shall have the right to request and receive a copy of personal data processed by the system. Such requests shall be made in writing to the data controller and shall be complied with within a maximum of 40 days. Personal data recorded by the CCTV system shall be retained for a maximum of 28 days. Thereafter it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in the Principal's office. Unauthorised access to this office is not permitted at any time. The office is kept secure when unoccupied.

The following procedures shall be followed in the event that An Garda Síochána seeks to view or take a copy of the CCTV footage from the school's CCTV systems:

1. The data controller shall satisfy herself that there is an investigation underway.
2. A request from An Garda Síochána must be made in writing on Garda Síochána headed notepaper.

All CCTV systems and associated equipment are required to be compliant with this policy.

## **Roles and Responsibilities**

The ***Board of Management*** will:

- Ensure the CCTV policy is in place, compliant with relevant legislation, to govern the use of CCTV in the school.
- Ensure this policy is reviewed regularly by the Board of Management.

The ***Principal*** will:

- Act as Data Controller on behalf of the Board of Management.
- Ensure that the use of the CCTV system is used in accordance with this Policy as set down by the Board of Management.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school.
- Ensure that all CCTV monitoring systems are compliant with this policy.
- Be responsible for the release of any information or material in compliance with this policy.
- Maintain a record of the release of any material recorded or stored on the system.
- Provide a list of the CCTV cameras, their locations and subsequent monitoring equipment and capabilities to the Board of Management for formal approval.
- Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the school.
- Advise the Board of Management that adequate signage, at appropriate and prominent locations is displayed.
- Ensure that external cameras are not intrusive in terms of their positions and views of residential housing and comply with the 'reasonable expectation of privacy'.

- Ensure that recorded material is retained for a period not longer than 28 days and will be erased unless required as part of a criminal investigation or court proceedings, criminal or civil, or other bona fide use as approved by the Board of Management.
- Ensure that monitors are stored in a secure place with access by authorised personnel only.
- Ensure that staff are familiar with this policy and that any revisions are publicly shared via the school website.

### **Links to Other Policies and to Curriculum Delivery:**

All school policies are consistent with one another, within the framework of the overall School Plan. Relevant school policies already in place, being developed or reviewed, are examined with reference to the CCTV Policy and any implications which it has for them are addressed.

The following policies are among those considered:

- Data Protection Policy
- Child Safeguarding Policy
- Bí Cineálta Policy
- Code of Behaviour Policy
- ICT Acceptable Usage Policy

The CCTV Policy has been developed mindful of the school's obligation under Data Protection Legislation.

### **Monitoring the Implementation of the Policy**

Staff and Board of Management members will satisfy themselves on an on-going basis that the actions/measures set down under the Policy are being implemented.

### **Reviewing and evaluating the Policy**

Ongoing review and evaluation of this Policy will take cognisance of changing information or guidelines and legislation, (e.g. from the Data Protection Commissioner or the Department of Education and Skills). The Policy will be revised as necessary in the light of such review and evaluation and within the framework of school planning.

*Signed:*

*Keenaghan*

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Frank Keenaghan

Chairperson of the Board of Management

*Lisa Breen*

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Lisa Breen

Principal

Policy review date: *8<sup>th</sup> Sept 2025*