

St. Columba's College Stranorlar



CCTV and Security Policy

November 2025

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1. Introduction and Rationale

1.1 Mission Statement and Ethos

St. Columba's College is committed to **'The pursuit of excellence in a caring environment.'** The operation of Closed-Circuit Television (CCTV) reflects this ethos by ensuring the safety and security of all students, staff, and College property in a respectful and lawful manner.

1.2 Rationale for CCTV Use

CCTV surveillance at St. Columba's College (and the old St. Mary's NS building) is intended for the following specified, explicit, and legitimate purposes:

- **Safety and Welfare:** To ensure the health and safety of staff, pupils, and visitors, and to assist in the prevention of bullying and anti-social behaviour.
- **Security and Deterrence:** To deter criminal activity, theft, and vandalism, thereby protecting the school buildings and College assets, both during and after school hours.
- **Law Enforcement Support:** To support An Garda Síochána in the detection of crime and anti-social behaviour.
- **Evidence:** To provide recorded evidence in support of investigations into disciplinary incidents (in line with the **Code of Behaviour**) or criminal matters.

1.3 Principles of Operation

The College ensures that CCTV systems are operated lawfully, fairly, proportionately, and transparently, in compliance with the **General Data Protection Regulation (GDPR)** and the **Data Protection Act (2018)**.

CCTV is not used to monitor employee performance, classroom teaching, or academic activities. Monitoring will never be used in a discriminatory manner based on protected characteristics such as race, gender, disability, religion, or sexual orientation.

The use of CCTV is justified, necessary, and proportionate, ensuring adherence to the principle of data minimisation.

The operation of existing systems will be reviewed periodically in consultation with staff, the Board of Management, and the Parents' Association.

St. Columba's College does not engage in covert surveillance. Any request by An Garda Síochána to conduct such surveillance must be formally authorised by law.

1.4 Privacy Impact Assessment

Before installing or significantly upgrading CCTV systems, the College will carry out a documented **Privacy Impact Assessment (PIA)** to ensure that the proposed use of CCTV is necessary, proportionate, and compliant with data protection legislation.

2. Scope and Operation

2.1 Policy Scope and Application

This policy applies to **all staff, students, visitors, and contractors** while on the school premises. The policy covers all surveillance equipment, including static and movable cameras, used for security purposes across the College campus.

2.2 Camera Locations and Coverage

CCTV cameras are strategically positioned and clearly targeted to monitor:

- **Perimeter and Access Points:** All entrances, exits, and external boundaries of the College.
- **Common Areas:** Reception area/offices, corridors, locker areas, canteen and general circulation areas.
- **Property:** Storage areas and car parks.

CCTV is strictly NOT located in areas where privacy is paramount, including: classrooms (except in specific, justified circumstances with explicit BoM approval), internal office spaces, changing rooms, toilet facilities, or staff private areas.

External cameras are positioned to avoid recording neighbouring residential properties or public spaces beyond the College boundary.

All monitors are kept out of view of staff, students, and visitors, and the control room is **securely locked** when unattended.

2.3 Signage and Notification

The College ensures that clear and prominent signage is displayed at the main entry points to the College and in all areas covered by CCTV. This signage informs all individuals that they are

entering an area where CCTV surveillance is in operation, in line with Data Protection requirements.

3. Data Protection and Access Procedures

3.1 Data Protection Principle

CCTV footage that records identifiable individuals constitutes **personal data** and is processed in accordance with the College's **Data Protection Policy**. The **Board of Management** is the Data Controller for all CCTV data.

3.2 Access to Recorded Footage

Access to recorded CCTV footage is strictly limited and controlled:

- **Authorised Viewers:** Only the **Principal** and **Deputy Principal** are authorized to access, view, or export recorded footage. This access is password-protected and auditable.
- **Purpose of Access:** Footage may only be viewed for the purposes specified in Section 1.2 (Safety, Security, and Investigative Evidence).
- **Third Parties:** Footage will only be disclosed to external parties (e.g., Gardaí, insurance investigators) upon receipt of a formal written request or a court order, and in full compliance with the **Data Protection Policy**.
- **Legal Advice:** The College may seek legal advice prior to the release of any recordings to external authorities.

3.3 Retention, Storage and Oversight

Recorded footage is retained for a maximum of **28 calendar days**, after which it is automatically overwritten or securely deleted unless required for a specific, ongoing investigation.

The Principal is responsible for ensuring compliance with this policy, the secure management of the CCTV system, and that only authorised personnel have access.

Day-to-day administration may be delegated, but overall accountability remains with the Principal and the Board of Management.

3.4 Data Subject Access Requests (SARs)

Individuals have the right to request a copy of their own personal data (footage of themselves). Requests must be submitted in writing to the **Principal**. The College will respond to all SARs within **one month** of receipt, in line with GDPR.

In processing a SAR, the College will take necessary steps to obscure the identity of all third-party individuals in the footage to protect their data rights. If other people's images cannot be obscured, it may not be possible to provide access to the personal data.

4. Relationship to Other Policies and Sanctions

4.1 Policy Integration

This CCTV Policy must be read in conjunction with the following:

- **Code of Behaviour (CoB):** CCTV footage is used solely as supporting evidence in disciplinary investigations carried out under the CoB.
- **Data Protection Policy:** This policy governs the handling, storage, retention, and access procedures for all personal data captured by the CCTV system.
- **Acceptable Use Policy (AUP):** Rules concerning the misuse of technology and digital equipment apply to any person accessing the CCTV system.

4.2 Breaches of Policy and Disciplinary Action

Any staff member, student, or contractor found to be breaching the terms of this policy, including unauthorized access to footage, tampering with the system, or inappropriate disclosure of recordings, will face disciplinary action:

- **Staff:** Action will be taken in accordance with the Staff Disciplinary Procedures and may result in serious sanctions up to and including dismissal.
- **Students:** Action will be taken in accordance with the sanctions detailed in the **Code of Behaviour** (e.g., suspension or expulsion).
- **Contractors/Visitors:** May have access withdrawn and/or be reported to the relevant authorities.

5. Ratification and Review

5.1 Implementation of Policy

St. Columba's College CCTV and Security Policy has been ratified by the Board of Management and formally adopted on **3rd December 2025**.

We commit to ensuring its implementation in a manner that upholds the College's Catholic identity while fully respecting the rights and dignity of every student.

Signature: P. J. McGowan
(Chairperson, Board of Management)

Date: 3/12/25

Signature: [Handwritten Signature]
(Principal)

Date: 3/12/2025

5.2 Review of Policy

The school will monitor / review on a regular basis, and evaluate the policy and all related work and procedures to ensure legal compliance and the maintenance of best practices.

Date for Review: November 2027