

Polasaí Córais Teilifís Chiorcaid Iata

CCTV Policy



RÉAMHRÁ INTRODUCTION

Tá Córais Teilifís Chiorcaid Iata (Córais TCI) a shuiteáil laistigh agus timpeall ar fhoirgneamh *Gaelscoil na Laochra*.

Déanfar athbhreithniú rialta ar an córais TCI i gcomhairle leis an bhfoireann, agus leis an Bord Bainistíochta.

Closed Circuit Television Systems (CCTS) are installed in Gaelscoil na Laochra. Their operation will be reviewed regularly in consultation with staff, and the board of management.

CUSPÓIR AN BHEARTAIS

PURPOSE OF POLICY

"Is é cuspóir an bheartais seo ná chun úsáid Teilifís Chiorcaid Iata agus a teicneolaiocht ghaolmhar a rialáil chun monatóireacht a dhéanamh ar phurlán inmheánacha agus sheachtracha an áitribh faoi shainchúram Gaelscoil na Laochra.

Suiteáltear córais TCI (go hinmheánach agus go seachtrach araon) in áitreabh ar mhaithe le feabhas a chur ar shlándáil an fhoirgnimh agus a threalaimh ghaolmhair mar aon le haireachas a chruthú i measc na n-áititheoirí, ag aon tráth amháin, go bhfuil córas slándála faireachais i bhfeidhm laistigh de agus/nó i bpurlán sheachtracha an áitribh i rith uaireanta sholas an lae agus na hoíche gach lá. Tá faireachas TCI ag Gaelscoil na Laochra beartaithe do na cuspóirí a leanas:

- foirgnimh na scoile agus sócmhainní na scoile a chosaint, i rith agus i ndiaidh uaireanta na scoile;
- sláinte agus sábháilteacht na forrne, na ndaltaí agus na gcuairteoirí a chur chun cinn;
- cosc a chur ar bhulaíocht;
- tarlú coireachta agus iompair fhrithshóisialta a laghdú (goid agus loitiméireacht san áireamh);

- tacú leis na Gardaí in iarrachtaí chun coireacht a dhíspreagadh agus a bhrath;
- cabhrú le ciontóirí a shainainthint, a ghabháil agus a ionchúiseamh; agus
- a chinntiú go léirítéar meas ar rialacha na scoile ionas gur féidir bainistiú ceart a dhéanamh ar an scoil.

“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 Gaelscoil na Laochra.

CCTV systems are installed (both internally and externally) in 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 within and/or 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:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Gardai in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

SCÓIP SCOPE

Baineann an beartas seo go díreach le láthair agus úsáid TCI agus monatóireacht agus taifeadadh a dhéanamh agus úsáid ina dhiaidh sin a bhaint as an ábhar taifeadta sin. Sa chás go dtugtar faoi ranganna agus gníomhaíochtaí in áitreabh ar cíos, cinnteoidh Gaelscoil na Laochra nach n-oibrítear córais TCI, nuair a bhíonn siad suiteáilte, ach ar bhealach atá comhoiriúnach d’fhorálacha an bheartais seo.

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out in rented premises, Gaelscoil na Laochra will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

Tá Gaelscoil na Laochra, mar an gcomhlacht corporáideach, freagrach go reachtúil as a réadmhaoin, trealamh agus gléasra eile a chosaint mar aon le braistint slándála a sholáthar dá fhostaithe, dhaltaí agus cuairteoirí ar a áitreabh. Tá dualgas cúram ar Gaelscoil na Laochra faoi fhórálacha an Acharta um Shábháilteacht, Sláinte agus Leas ag an Obair, 2005 agus faoin reachtaíocht ghaolmhar agus úsáideann siad córais TCI agus a dtrealamh gaolmhar monatóireachta agus taifeadta mar mhodh breise slándála agus faireachais ar mhaithe le feabhas a chur ar cháilíocht beatha phobal na scoile trí na dea-chleachtais a chomhtháthú a dhéanann rialáil ar fhaireachas poiblí agus príobháideach a n-áitribh.

Tabharfar faoi úsáid a bhaint as an gcóras TCI ar bhealach gairmiúil, eiticiúil agus dlíthiúil agus cuirtear cosc sa bheartas seo ar aon athrú ar úsáid na dteicneolaíochtaí slándála TCI do chuspóirí eile, e.g. ní úsáidfear TCI chun monatóireacht a dhéanamh ar fheidhmíocht fostaithe.

Ní féidir scaoileadh le fainsnéis a fhaightear tríd an gcóras TCI ach nuair a údaraíonn an Príomhoide¹ amhlaidh, i ndiaidh dul i gcomhairle le Bord Bainistíochta na scoile. Déanfar aon iarratas ar thaifeadtaí/íomhánna TCI ón nGarda Síochána a chur i dtaifead go hiomlán agus lorgófar comhairle dlí má dhéantar a leithéid d'iarratas. (Féach “Rochtain” thíos). Má tá taifeadadh á lorg ag údarás forfhorfheidhmithe dlí, ar nós an Gharda Síochána, d'imscrúdú ar leith, b'fhéidir go dteastóidh barántas ón nGarda Síochána agus ba cheart aon iarratas a dhéanann an Garda Síochána a iarraidh i scríbhinn dá réir sin, agus lorgóidh Gaelscoil na Laochra comhairle dlí láithreach bonn.

Tabharfar faoi mhonatóireacht TCI ar áiteanna poiblí ar mhaithe le cuspóirí slándála ar bhealach atá comhsheasmhach le gach beartas reatha lena nglacann an scoil, lena n-áirítear Beartas Comhionannais agus Éagsúlachta, Beartas um Dhínit ag an Obair, Coid Chleachtais chun déileáil le gearáin i leith Bulaíochta agus Ciapadh Gnéasach agus beartais eile ábhartha, lena n-áirítear na forálacha a leagtar síos i reachtaíocht chomhionannais agus i reachtaíocht oideachais agus i reachtaíocht ghaolmhar eile.

Cuirtear toirmeasc sa bheartas seo ar mhonatóireacht bunaithe ar shaintréithe agus aicmiú a chuimsítear i reachtaíocht chomhionannais agus i reachtaíocht ghaolmhar eile, e.g. cineál, inscne, gnéaschlaonadh, bunadh náisiúnta, míchumas etc.

Tá fismhonatóireacht ar áiteanna poiblí ar mhaithe le cuspóirí slándála laistigh d'áitreabh na scoile teoranta d'úsáidí nach sáraíonn ionchas réasúnta an duine aonair i leith príobháideachta.

Ní féidir fainsnéis a fhaightear a sháraíonn an beartas seo a úsáid in imeacht disciplíneach i leith fhostáí na scoile nó i leith dalta a fhreastalaíonn ar cheann dá scoileanna/n-ionaid. Beidh ar gach córas TCI agus trealamh gaolmhar an beartas seo a chomhlíonadh tar éis go nglacann Gaelscoil na Laochra leis. “Sonrai pearsanta” iad íomhánna inaithéanta a ghlacann

¹ Tuigtear go n-áirítear sa tagairt do Phríomhoide i gcomhthéacs scoile cinn ionad atá faoi shainchúram BOO.

córais TCI. Tá siad faoi réir fhórálacha na nAchtanna um Chosaint Sonrai, 1988 agus 2003 agus GDPR.

Gaelscoil na Laochra 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 visitors to its premises. Gaelscoil na Laochra 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 Board of Management. Any requests for CCTV recordings/images from An Garda Siochána will be fully recorded and legal advice will be sought if any such request is made. (See "Access" below). If a law enforcement authority, such as An Garda Siochána, is seeking a recording for a specific investigation, An Garda Siochána may require a warrant and accordingly any such request made by An Garda Siochána should be requested in writing and the school will immediately seek legal advice.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual 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 legislation 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 one of its schools/centres. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Gaelscoil na Laochra. 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 GDPR.

ÚDAR A THABHAIRT LE TCI A ÚSÁID CCTV

JUSTIFICATION FOR USE OF

Ceanglaíonn Alt 2(1)(c)(iii) de na hAchtanna um Chosaint Sonraí go mbíonn sonraí “leordhóthanach, ábhartha agus nach mbíonn siad iomarcach” maidir leis an gcuspóir dá mbailiódh iad. Ciallaíonn seo gur gá go mbeadh Gaelscoil na Laochra in ann údar a thabhairt le sonraí pearsanta a fháil agus a úsáid trí chóras TCI Measann an Bord Bainistíochta go bhfuil údar le TCI a úsáid chun imlíne fhoirgnimh na scoile a rialáil ar mhaithe le cuspóirí slándála. Tá an córas in ainm is íomhánna d’ionróirí nó de dhaoine aonair a dhéanann síobháil do réadmhaoin nó a bhaineann earraí gan údarú a ghabháil.

Ní úsáidfear córais TCI chun monatóireacht a dhéanamh ar ghnáthghníomhaíocht mhúinteora/daltaí sa seomra ranga sa scoil.

In áiteanna eile sa scoil inar suiteáladh TCI, e.g. fáiltiú, thaispeáin an Príomhoide gur cruthaíodh gur baol do shlándáil agus/nó do shláinte agus sábháilteach agus go bhfuil an TCI comhréireach agus é ag dul i gneáleach leis na saincheisteanna siúd a tháinig chun solais sular cuireadh an córas i bhfeidhm.

Section 2(1)(c)(iii) of the Data Protection Acts requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that Gaelscoil na Laochra 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 capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

In other areas of the school where CCTV has been installed, e.g. reception, the Principal has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

LÁTHAIR NA GCEAMARAÍ

LOCATION OF CAMERAS

Ceann de na rudaí is mó ar cheart machnamh a dhéanamh air ná láthair na gceamaraí. Bheadh sé deacair údar a thabhairt le TCI a úsáid chun monatóireacht a dhéanamh ar na háiteanna a mbeadh súil réasúnta ag daoine aonair le príobháideacht. Thug Gaelscoil na Laochra faoi

láithreacha a roghnú chun na ceamaraí TCI is lú is ionsáite a shuiteáil chun príobháideacht daoine aonair a chosaint. Bíonn ceamaraí atá in ainm is áiteanna seachtracha a thaifeadadh suite ar an mbealach sin a chuireann cosc ar nó a íoslaghdaionn an taifeadadh a dhéantar ar dhaoine atá ag siúl faoi bhráid nó ar réadmhaoin phríobháideach duine eile.

D'fhéadfá an méid a leanas a áireamh le Físmhonatóireacht agus Fístaifeadadh TCI ar Áiteanna Poiblí i nGaelscoil na Laochra

- **Foirgnimh agus réadmhaoin na scoile a chosaint:** Imlíne, bealaí isteach agus amach, pasáistí agus conairí, limistéir speisialta stórála, láithreacha airgeadóra, limistéir ghlaicta le haghaidh earrai/sheirbhísí an fhoirgnimh
- **Monatóireacht a dhéanamh ar Chórás Rialaithe Rochtana:** Monatóireacht agus taifeadadh a dhéanamh ar limistéir ar a bhfuil rochtain shrianta ag bealaí isteach chuig foirgnimh agus limistéir eile
- **Aláram Shlándála a Fhiorú:** Aláram ionraíd, rialúcháin dorais amach, aláram sheachtracha
- **Físpatról ar Áiteanna Poiblí:** Limistéir pháirceála, na Príomhgheataí isteach/amach, Rialú Tráchta
- **Imscrúduithe Coiriúla (faoina dtugann an Garda Síochána):** Faireachas robála, buirgléireachta agus gada

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Gaelscoil na Laochra 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 Gaelscoil na Laochra may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, 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, Traffic Control
- **Criminal Investigations (carried out by An Garda Síochána):** Robbery, burglary and theft surveillance

FAIREACHAS CEILTE COVERT SURVEILLANCE

Ní thabharfaidh Gaelscoil na Laochra faoi fhaireachas ceilte.

Sa chás go n-iarrann an Garda Síochána chun tabhaint faoi fhaireachas ceilte ar áitreabh na scoile, b'fhéidir go dteastóidh toiliú breithimh ón bhfaireachas ceilte sin. Dá réir, déanfaidh an Garda Síochána aon iarratas den sórt sin i scríbhinn agus lorgóidh an scoil comhairle dlí.

Gaelscoil na Laochra 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 legal advice.

FÓGRAÍOCHT – COMHARTHAIÓCHT

NOTIFICATION – SIGNAGE

Soláthroidh an Príomhoide cóip den Bheartas TCI seo ar iarraidh sin don fhoireann, daltaí, tuismitheoirí agus cuairteoirí chuig an scoil. Déantar cur síos sa bheartas seo ar chuspóir agus láthair na monatóireachta TCI, uimhir theagmhála dóibh siúd ar mian leo plé a dhéanamh ar mhonatóireacht TCI agus ar threoirí lena úsáid. Anuas air sin, tabharfar le fios láthair cheamaraí TCI don Bhord Bainistíochta. Cuirfear an chomharthaíocht leordhóthanach in airde ag gach láthair ina bhfuil ceamara(i) suite lena thabhairt le fios go bhfuil TCI i bhfeidhm. Taispeánfar an chomharthaíocht leordhóthanach, chomh maith, go feiceálach ag an mbealach isteach chuig réadmhaoin Gaelscoil na Laochra.



RABHADH
Ceamaraí TCI i bhfeidhm

Áireofar leis na láithreacha oiriúnacha do chomharthaíocht an méid a leanas:

- ag bealaí isteach chuig áitreabh, i.e. doirse seachtracha, geataí scoile
- an limistéar fáiltithe

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, a contact number for those wishing to discuss CCTV monitoring and 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(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to Gaelscoil na Laochra property.



WARNING
CCTV cameras in operation

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area

STÓRÁIL AGUS COINNEÁIL STORAGE & RETENTION

Forálann Alt 2(1)(c)(iv) de na hAchtanna um Chosaint Sonrai nach ndéanfar sonrai “a choimeád do thráth níos faide ná mar a theastaíonn” ar mhaithe leis na cuspóirí lena bhfuarthas iad. Is gá go mbeidh rialaitheoir sonrai in ann údar a thabhairt leis an tréimhse choinneála seo. I gcás gnáthchóras slándála TCI, ba dheacair údar a thabhairt le sonrai a choinneáil níos faide ná mí (28 lá), seachas sa chás go sainaithníonn na híomhánna saincheist – ar nós briseadh isteach nó gada agus go gcoinnítear na híomhánna/taifeadtaí ar leith go sonrach i gcomhthéacs imscrúdaithe/ionchúisimh a dhéanamh ar an tsaincheist sin.

Dá réir sin, coinneofar na híomhánna a ghabhann an córas TCI ar feadh tréimhse uasta 28 lá, seachas sa chás go sainaithníonn na híomhánna saincheist agus go gcoinnítear iad go sonrach i gcomhthéacs imscrúdaithe/ionchúisimh a dhéanamh ar an tsaincheist sin.

Stórálfar na híomhánna/taifeadtaí i dtimpeallacht shlán. Ní bheidh rochtain ach ag an bpearsanra údaraithe orthu. Beidh an Príomhoide freagrach as maoiriú a dhéanamh ar rochtain agus ar chothabháil an Chórais TCI. Féadfaidh an Príomhoide riarradh an Chórais TCI a tharmligeann do chomhalta eile foirne. Faoi chuínsí áirithe, féadfaidh daoine eile amharc ar na taifeadtaí d’fhearr na cuspóirí a leagtar amach thusa a bhaint amach (i measc na ndaoine siúd, d’fhéadfaí na Gardaí, an Príomhoide Tánaisteach, an Blianmhúinteoir ábhartha, comhaltaí eile den fhoireann mhúinteoirreachta, ionadaithe na Roinne Oideachais agus Scileanna, ionadaithe FSS agus/nó tuismitheoir dalta thaifeadta a áireamh). Nuair a bhítear ag amharc ar thaifeadtaí TCI, ní bheidh rochtain ach ag daoine údaraithe ar bhonn riachtanais.

Stórálfar téipeanna/DVDanna i dtimpeallacht shlán agus coimeádfar taifead rochtana ar théipeanna. Ní bheidh rochtain ach ag an bpearsanra údaraithe orthu. Cuirfear a

mhacasamhail de bhearta i bhfeidhm nuair a bhíonn stóráil diosca á húsáid, agus cruthófar taifid uathoibríocha rochtana ar na híomhánnna.

Section 2(1)(c)(iv) of the Data Protection Acts 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/recording 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/recording will be stored in a secure environment. Access will be restricted to authorised 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, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Gardai, the Deputy Principal, 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 of a recorded student). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

ROCHTAÍN ACCESS

Ní bheidh rochtain ach ag an bpearsanra údaraithe ar an gcóras TCI agus ar íomhánnna stóráilte, i.e. Príomhoide na scoile.

Faoi chúinsí ábhartha, féadtar rochtain a fháil ar phíosa scannáin TCI:

- Ag an nGarda Síochána, sa chás go gceanglaítear ar Gaelscoil na Laochra (nó a ngníomhairí) le dlí chun tuairisc a dhéanamh maidir le coir amhrasta a dhéanamh; nó
- I ndiaidh go ndéanann an Garda Síochána iarratas nuair a tharla coir nó coir amhrasta agus/nó nuair a bhítear in amhras go bhfuil iompar neamhdhleathach/frithshóisialta ar bun ar réadmhaoin Gaelscoil na Laochra, nó
- Ag FSS agus/nó aon chomhlacht reachtúil eile atá freagrach as cosaint leanaí; nó
- Chun cabhrú leis an bPríomhoide chun firicí a dheimhniú i leith iompar neamh-inghlactha daltaí, agus cuirfear na tuismitheoirí/na caomhnóirí ar an eolas, sa chás sin; nó
- Ag ábhair shonraí (nó a n-ionadaithe dlí), tar éis go ndéantar iarratas ar rochtain ina soláthraítear am, dáta agus láthair na dtaifeadtaí do Gaelscoil na Laochra, nó

- Ag daoine aonair (nó a n-ionadaithe dlí) faoi réir ordú cúirte.
- Comhlacht árachais na scoile sa chás go dteastaíonn an céanna ón gcomhlacht árachais chun tabhairt faoi éileamh ar dhíobháil a rinneadh don réadmhaoin faoi árachas.

Iarratais ón nGarda Síochána: Ní scaoilfear le fainseis a fhaightear trí fhísmhonatóireacht ach nuair a údaraíonn an Príomhoide amhlaidh, i ndiaidh dul i gcomhairle le Bord Bainistíochta na scoile. Má tá íomhánnna TCI á lorg ag an nGarda Síochána d’imscrúdú ar leith, b’fhéidir go dteastóidh barántas ón nGarda Síochána agus ba cheart don Gharda Síochána aon iarratas den sórt sin a dhéanamh i scribhinn agus ba cheart don scoil comhairle dlí a lorg láithreach bonn.

Iarratais ar rochtain: Ar iarratas scríofa a dhéanamh, tá an cheart ag aon duine a ndearnadh a (h)íomhá a thaifeadadh go soláthrófar dó/di cóip den fhaisnéis a taifeadadh a bhaineann leo, a fhad agus gurb ann don íomhá/taifeadadh sin, i.e. nár scriosadh é agus a fhad agus nach mbaineann síolúine/toirmeasc leis an scaoileadh chomh maith. Sa chás go sainaithnítear duine eile san íomhá/taifeadadh, ní fhéadtar scaoileadh leis na híomhánnna siúd ach sa chás gur féidir iad a chur in eagair/gan tréithe pearsanta ar bith de chuid duine a léiriú ionas nach sainaithnítear an duine eile nó nach mbíonn sé/sí inaitheanta. Chun a gceart rochtana a fheidhmiú, ní mór d’ábhar sonraí iarratas a dhéanamh i scribhinn le Príomhoide na scoile. Gearraídh Gaelscoil na Laochra táille an la ear an méid a chosnaíonn agus ní mór dúinn freagairt a thabhairt **laistigh de 40 lá**.

Is féidir iarratais ar rochtain a dhéanamh chuig na daoine a leanas: An Príomhoide, Gaelscoil na Laochra.

Ba cheart do dhuine an fhaisnéis riachtanach go léir a sholáthar chun cabhrú le Gaelscoil na Laochra chun na sonraí taifeadta TCI a aimsiú, ar nós dháta, am agus láthair an taifeadta. Má tá an íomhá ar chaighdeán chomh híseal sin nach sainaithnítear duine go soiléir, ní féidir a mheas gurb ionann an íomhá sin agus sonraí pearsanta agus ní féidir le Gaelscoil na Laochra an íomhá sin a sholáthar dóibh.

Nuair a thugtar cóip dá sonraí do dhuine, féadfaidh Gaelscoil na Laochra grianghraif/sraith pictiúir ghrianghraif, téip nó diosca ar a bhfuil na híomhánnna ábhartha a sholáthar. Déanfar íomhánnna eile de dhaoine eile a dhoiléiriú sula scaoilfear leis na sonraí, áfach.

*Access to the CCTV system and stored images will be restricted to authorised personnel only
i.e. Principal of
In relevant circumstances, CCTV footage may be accessed:*

- By An Garda Síochána where Gaelscoil na Laochra (or its agents) are required by law to make a report regarding the commission of a suspected crime; or

- 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 Gaelscoil na Laochra property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Gaelscoil na Laochra, or
- To individuals (or their legal representatives) subject to a court order.
- 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 Board of. 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.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always 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 in writing to the school Principal. The school will pass on the commercial charge for processing the request to the individual or body that is requesting the access. Such a request must be responded to within 40 days.

Access requests can be made to the following: Priomhoide, Gaelscoil na Laochra.

A person should provide all the necessary information to assist Gaelscoil na Laochra 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 their data, the school may provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

FREAGRACHTAÍ RESPONSIBILITIES

Déanfaidh an Príomhoide an méid a leanas:

- A chinntiú go gcuirtear úsáid córais TCI i bhfeidhm i gcomhréir leis an mbeartas a leagann Gaelscoil na Laochra síos
- Maoiriú agus comhordú a dhéanamh ar úsáid monatóireacht TCI ar mhaithe le cuspóirí sábháilteachta agus slándála laistigh de Gaelscoil na Laochra
- A chinntiú go ndéanfar measúnú ar gach córas reatha monatóireachta TCI i dtaobh chomhlíonadh an bheartais seo
- A chinntiú go bhfuil an mphonatóireacht TCI ag Gaelscoil na Laochra ar aon dul leis na caighdeáin agus na cosaintí is airde
- Athbhreithniú a dhéanamh ar láithreacha na gceamaraí agus bheith freagrach as aon fhaisnéis nó ábhair thaifeadta TCI a stóráiltear a scaoileadh i gcomhlíonadh an bheartais seo
- Taifead rochtana a choimeád (e.g. taifead ar rochtain) chun scaoileadh téipeanna nó aon ábhair a thaifeadtar nó a stóráiltear sa chóras a thaifeadadh
- A chinntiú nach ndéantar dúbláil ar théipeanna monatóireachta taifeadta lena scaoileadh
- A chinntiú go gcomhlíonann an imlíne amhairc ó cheamaraí láithreach seasta an beartas seo go hinmheánach agus go seachtrach araon
- Láthair cheamaraí sealadacha a fhaomhadh a úsáidfear i rith imeachtaí speisialta a bhfuil riachtanais slándála ar leith acu agus a chinntiú go n-aistarraigítear iad i ndiaidh na n-imeachtaí siúd *NÓTA: [Ní áirítear le ceamaraí sealadacha trealamh fise soghluaise nó ceamaraí faireachais cheilte a úsáidtear d'imscrúduithe údaraithe coiriúla ag an nGarda Siochána].*
- Breithniú a dhéanamh ar aiseolas/ghearán ó dhaltaí agus ón bhfoireann araon maidir le sárú féideartha príobháideachta nó rúndachta mar gheall ar láthair cheamara ar leith TCI nó trealamh gaolmhar
- A chinntiú nach sáraíonn gach limistéar ar a bhfuil monatóireacht á déanamh ionchas breisithe daoine i leith príobháideachta laistigh den scoil agus bheith aireach nach dócha go dtarlóidh aon sárú den sórt sin
- Comhoibriú le hOifigeach Sláinte agus Sábháilteachta Gaelscoil na Laochra maidir le tuairisciú a dhéanamh ar an gcóras TCI atá i bhfeidhm sa scoil
- A chinntiú go mbíonn ceamaraí seachtracha neamh-ionsáiteach i dtaobh a suíomhanna agus a n-amharc ar thithíocht chónaithe ina n-aice agus prionsabal “Ionchas Réasúnta Príobháideachta” a chomhlíonadh
- A chinntiú go stóráiltear téipeanna monatóireachta in áit shlán agus nach mbíonn rochtain orthu ach ag an bpearsanra údaraithe
- A chinntiú go stóráiltear íomhánna a thaifeadtar ar feadh tréimhse nach faide ná 28 lá agus go nglantar iad ina dhiaidh sin mura dteastaíonn siad mar chuid d'imscrúdú coiriúil nó imeachtaí cúirte (coiriúil nó sibhialta) nó úsáid bona fide eile faoi mar a fhaomhann Cathaoirleach an Bhoird.

- A chinntiú, nuair a bhíonn an áis zúmála á húsáid ar cheamara, go bhfuil an dara duine i láthair le hoibreoir an cheamara lena chinntiú nach ndéantar aon sárú ar phríobháideacht gan iaraidh
- A chinntiú nach ndéantar rialú ceamara ach amháin chun monatóireacht a dhéanamh ar iompar amhrasta, díobháil choiriúil etc. agus gan monatóireacht a dhéanamh ar shaintréithe aonair.
- A chinntiú nach bhfuil rialú ceamara ag sárú an ionchais réasúnta atá ag duine i leith príobháideachta in áiteanna poiblí
- A chinntiú sa chás go n-iarrann an Garda Siochána chun trealamh fise soghluaiste a shocrú le haghaidh imscrúduithe coiriúla, go bhfuarthas comhairle dlí ó Bhoird na scoile.

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Gaelscoil na Laochra.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Gaelscoil na Laochra.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Gaelscoil na Laochra is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events.
NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by An Garda Siochána].
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- 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
- Co-operate with the Health & Safety Officer of Gaelscoil na Laochra in reporting on the CCTV system in operation in the school

- 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”
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- 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 the Board.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas
- Ensure that where An Garda Síochána request to set up mobile video equipment for criminal investigations, legal advice has been obtained and such activities have the approval of the Board.

CUR I BHFEIDHM AGUS ATHBHREITHNIÚ IMPLEMENTATION & REVIEW

Déanfar athbhreithniú agus measúnú ar an mbeartas ó thráth go tráth. Tabharfaidh athbhreithniú agus measúnú leanúnach aird ar fhaisnéis nó treoirlínte athraitheacha (e.g. ón gCoimisinéir Cosanta Sonrai, an Garda Síochána, an Roinn Oideachais agus Scileanna, aonaid Iniúchta (inmheánach agus seachtrach sa scoil), comhlachtaí náisiúnta bainistíochta, reachtaíocht agus aiseolas ó thuismitheoirí/chaomhnóirí, daltaí, an fhoireann agus daoine eile.

Is ionann an dáta óna mbeidh an beartas i bhfeidhm agus an dáta a nglacfaidh an Bord Bainistíochta leis. Déanfaidh Príomhoide na scoile monatóireacht ar chur i bhfeidhm an bheartais.

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

Daingniú Ratification

Cuireadh an polasaí seo i bhfeidhm i Mí Feabhra 2024.

This policy was updated and implemented from February 2024.

Sinthe: Seán Ó Siadhail Dáta 27/03/2024
Caththaoirleach

Sinthe: Mairtin Ó Cíosóig Dáta 20/03/2024.
Príomhoide

AGUISÍN 1 – SAINMHÍNITHE

Sainmhínithe ar fhocail/nathanna a úsáidtear maidir le sonraí pearsanta a chosaint agus dá dtagraítear i dtéacs an bheartais;

TCI – Is ionann teilifis chiorcaid iata agus fischeinmaraí a úsáid chun comhartha a tharchur chuig áit ar leith ar shraith theoranta monatóirí. Féadtar na híomhánna a thaifeadadh, ina dhiaidh sin, ar fhís téip nó ar DVD nó ar mheicníocht eile taifeadta dhigití.

Na hAchtanna um Chosaint Sonrai, 1988 – Bronnann na hAchtanna um Chosaint Sonrai, 1988, 2003 agus GDPR cearta ar dhaoine, mar aon le freagrachtaí ar na daoine siúd a láimhseálann, a phróiseálann, a bhainistíonn agus a rialaíonn sonraí pearsanta. Ní mór d’fhoireann uile na scoile/an BOO forálacha na nAchtanna um Chosaint Sonrai a chomhlíonadh nuair a dhéanann siad faisnéis phearsanta a bhailiú agus a stóráil. Baineann seo le faisnéis phearsanta a bhaineann le fostaithe na heagraíochta agus le daoine a idirghníomhaíonn leis an eagraíocht.

Sonrai – Faisnéis i bhfoirm ar féidir í a phróiseáil. Áirítear leis sonraí uathoibrithe nó leictreonacha (aon fhaisnéis ar ríomhaire nó aon fhaisnéis a thaifeadtar agus é ina chuspóir í a chur ar ríomhaire) agus sonraí de láimh (faisnéis a thaifeadtar mar chuid de chóras ábhartha comhdaithe nó nuair is é an cuspóir gur cheart di bheith mar chuid den chóras ábhartha comhdaithe).

Sonrai Pearsanta – Sonrai a bhaineann le duine beo atá sainaitheanta nó ar féidir é/í a shainaithint cibé acu ó na sonrai nó ó na sonrai i gcomhar le faisnéis eile atá faoi sheilbh, nó ar dócha go mbeidh sí faoi sheilbh an rialaitheora sonrai.

Iarratas ar Rochtain – Is ionann seo agus nuair a dhéanann duine iarratas leis an eagraíocht chun a sonraí pearsanta a noctadhbh faoi Alt 3 agus/nó 4 de na hAchtanna um Chosaint Sonrai.

Próiseáil Sonrai – tabhairt faoi aon oibriúchán nó sraith oibriúchán ar shonrai, lena n-áirítear an méid a leanas:

- Na sonrai a fháil, a thaifeadadh nó a choimeád,
- Na sonrai a bhailiú, a eagrú, a stóráil, a athrú nó a oiriúnú,
- Na sonrai a aisghabháil nó a úsáid nó dul i gcomhairle na sonrai,
- Na sonrai a noctadhbh trí iad a tharchur, a scaipeadh nó iad a chur ar fáil ar bhealach eile,
- Na sonrai a ailíniú, a chomhcheangal, a scriosadh nó a mhilleadh.

Ábhar Sonrai – duine atá mar ábhar sonraí pearsanta.

Rialaitheoir Sonrai – duine a dhéanann rialú (cibé acu leis/léi féin nó le daoine eile) ar ábhair agus ar úsáid sonraí pearsanta.

Próiseálaí Sonrai – duine a phróiseálann faisnéis phearsanta thar ceann rialaitheoir sonrai, ach nach n-áirítear fostáí rialaitheoir sonrai leo a phróiseálann na sonrai siúd i gcaitheamh a bhfostaíochta, mar shampla, d’fhéadfadh fostáí eagraíochta a bheith i gceist lena seachfhoinsíonn an rialaitheoir sonrai obair. Leagann na hAchtanna um Chosaint Sonrai freagrachtaí ar na haonáin siúd maidir leis an bpróiseáil a dhéanann siad ar na sonrai.

APPENDIX 1 - DEFINITIONS

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the 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 on video tape or DVD or other digital recording mechanism.

The Data Protection Acts – The Data Protection Acts 1988 and 2003 and GDPR confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All school 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 under Section 3 and/or section 4 of the Data Protection Acts.

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

- Obtaining, recording or keeping the data.
- Collecting, organising, storing, altering or adapting the data.
- Retrieving, consulting or using the data.
- Disclosing the data by transmitting, disseminating or otherwise making it available.
- 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.

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.

