

Data Protection Impact Assessment CCTV

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Data Protection Impact Assessment CCTV

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Data Protection Impact Assessment - CCTV

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1. Scope



This Data Privacy Impact Assessment has been prepared for the use of CCTV at St Caimin's Community School (the "School", "we", "us" or "our") The purpose of the DPIA is to ensure that data subject's rights and freedoms are not overridden by the use of CCTV at the School.

2. Privacy Awareness



The Data Protection Policy should be referred to when consulting this document. St Caimin's Community School will ensure that management and staff are aware of the Data Protection Act 2018 ("DPA") and are trained appropriately to their duties in respect of processing of personal data as per this data protection policy. The training and awareness programme will consist of:

- Briefing to all staff.
- A general email to all staff with this policy.

3. Balance of Rights



In using personal data for the operation of the School, we will ensure that we will only use a subject's data if the subject's rights do not outweigh our lawful basis in using that data.

The balance will be assessed by first checking that we have a lawful basis for using the data, and then evaluating whether disproportionate financial, reputational or social harm could be caused to the individual through our use of their data. We will achieve this on an ongoing basis via the Data Protection Impact Assessment for CCTV and Record of Processing methods already detailed in the Data Protection Policy.

4. Lawful Processing Criteria



St Caimin's Community School processes personal data in the pursuance of several lawful processing criteria. In all cases we examine the balance of rights with respect to the use of personal data. It is our objective to align our activities with the rights of the data subject, such that our use of their data is beneficial to the data subject and that any inconvenience or risk to the data subject is minimal in comparison with the benefits there from. We have established our lawful processing criteria in the Data Processing Map and Retention Schedule outlined in our Data Protection Policy.



5. Responsible Person Contact Details



Below are the contact details of the person most qualified to respond to questions regarding the Data Protection Impact Assessment for CCTV:

- Title: Principal.
- Address: Tullyvarraga, Shannon, Co. Clare. V14 XY54
- Telephone: 061 364211.
- Email: info@stcaimins.ie



6. Privacy Principles



Principle 1: Lawfulness, fairness and transparency

St Caimin's Community School believes in operating our School fairly and ethically and this will extend to all personal data held for those purposes. Subjects will be informed when data is being collected, and at the same time informed what we will use that data for. We will ensure that appropriate technical and organisational measures are in place to secure that data.

Collection and processing of data will be transparent. Advisory notices and privacy notices relating to data rights will be published as appropriate in plain English and will be structured where relevant to improve accessibility of this information to data subjects. Persons will be clearly advised of their rights also.

Principle 2: Purpose Limitation

Personal data collected by St Caimin's Community School will be processed only for the purpose for which it was collected. In the event that this purpose should change, data subjects will be informed within the 30-day regulatory period and consent sought for the change.

Principle 3: Data Minimisation

St Caimin's Community School will collect only the minimum quantity of personal data to carry out a particular task. Where appropriate, potential data subjects will be requested not to provide unwanted or inappropriately sensitive personal information.

Principle 4: Data Accuracy

St Caimin's Community School will make every effort to ensure that subjects' information is accurate and up to date. St Caimin's Community School will endeavour to ensure via appropriate levels of staff training that it is transcribed accurately. If it is not possible for subjects to correct their data personally, data can be corrected by contacting Reception.

Principle 5: Storage Limitation

St Caimin's Community School will store and retain personal data only while there is a valid and lawful basis to do so. Personal information will be deleted when it is no longer required for the purposes for which it was collected.

Where systems do not allow deletion of all records relating to an individual, records will be anonymised by replacing personal information fields with substituted generic text.

Principle 6: Integrity & Confidentiality

Personal Data shall be processed securely i.e. in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage. St Caimin's Community School will use appropriate technical and organisational measures to ensure the integrity and confidentiality of personal data is maintained at all times.

Principle 7: Accountability

St Caimin's Community School is responsible for and is able to demonstrate compliance with the DPA. This means St Caimin's Community School will demonstrate that these Data Protection Principles (as outlined here) are met for all Personal Data for which it is responsible.



7. Data Protection Impact Assessment

Identify the need for a DPIA

What is the aim of the CCTV system?

CCTV consistently delivers benefits in terms of improved health and safety and security within Schools. It complements other security measures which are in place within the School.

CCTV aims to achieve the following:

- Improve the health and safety and security of pupils, staff, and visitors
- Protect the School buildings and internal infrastructure
- Improve pupil behaviour
- Reduce vandalism
- Provide assistance in the detection and prevention of crime

Parents have the assurance that their children are safe whilst in School. Parents are aware that with CCTV there is the potential for behaviour at School to improve. The Board of Management is also of the opinion that this is the case.

St Caimin's Community School has produced a CCTV Policy. The policy highlights what personal data is used and the lawful basis for using this personal data. It also highlights who the School will share the personal data with and how long the information will be kept.

Reference is made to the CCTV system in the School's Information Asset Register.

Describe the processing

What is the nature of the data?

The CCTV system will provide the School with pictures from various fixed based cameras located throughout the School and the images will be transmitted/captured on a digital video recorder (DVR). The CCTV system is operational 24 hours a day, 7 days a week.

The images are transmitted to a digital video recorder which is housed in a locked office of the School. Access is restricted via a locked door. Access to the School is via a secure door entry system. The School reception is manned throughout the School day. The images are stored on the hard drive of the digital video recorder. The DVR is located within a locked room.

The transmitted images can be viewed live in the Deputy Principal's office on a video screen by the Principal, the Deputy Principal, Principal approved staff and approved contractors only. This is documented in the School's CCTV Policy. This helps to maintain site security, access control, pupil and staff safety.

What is the source of the data?

The CCTV system provides still/video pictures, which are transmitted from cameras positioned in various locations throughout the School. All of the CCTV cameras are fixed on a particular scene.



Will you be sharing data with anyone?

The information is used to ensure the health and safety and security of pupils, staff and visitors. They can be used to detect unauthorised visitors, pupils with poor behaviour/internal truancy, and protection of damage to School assets. The information may be shared with the Senior Management Team and An Garda Síochána for investigation and enforcement purposes. Disclosure of data is covered by the School's internal processes which are fully compliant with relevant legislation and Codes of Practice (please see the School's CCTV Policy).

What types of processing identified as likely high risk are involved?

Recording of images. Storage of images securely. Appropriate data retention applied to the images. The digital video recorder is located in a dedicated room within a locked cabinet. Access to the images is password protected. Data Management controls include passwords to the CCTV system. (see above) Individuals can request copies of CCTV data which contains their personal information by submitting a subject access request.

What is the nature of the data?

The CCTV data captured are still and video recordings. By default, the CCTV may be picking up special category data including race/ethnic origin and the health of an individual.

How much data is collected and used and how often?

The CCTV is operational 24 X 7.

How long will you keep the data for?

Images will be retained for 28 days unless requested as part of an incident and then stored on archive for the period of the investigation process or for 12 months whichever is the lesser. The Data Management System automatically deletes the information after 28 days.

Scope of data obtained

The CCTV images are obtained within the confines of the School.

What is the nature of your relationship with the individuals?

The School provides education to its students on a term time basis with staff delivering the National Curriculum. The School may receive a number of visitors on a daily basis including contractors, inspectors, support and agency staff, etc.

How much control will they have?

The School does inform pupils, staff and visitors that CCTV is in use by installing signs detailing their presence. One is located to the front of the School and one to the rear of the School.

The CCTV system is capable of identifying individuals from the system and the images can be used in both criminal and civil court cases.

If a Subject Access Request is made data may be downloaded or copied for release to the data subject or a third party. Each request for data must be requested via a signed data release form.

In the case of An Garda Síochána, the request must be made in writing on official Garda headed paper, signed by a member of the rank of Superintendent or above, and stating that it is made pursuant to section 41(b) of the Data Protection Act 2018. Such requests are processed via the School's Senior Management.



Do CCTV recordings include children or other vulnerable groups?

Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected.

There are no cameras in toilet areas, changing rooms, and there are no cameras aimed at private areas such as residents' houses, etc.

CCTV signage will be clearly visible from the street.

Are there prior concerns over this type of processing or security flaws?

The School has a CCTV Policy. The system is operated in line with relevant legislation and the Data Protection Commission's guidance on the use of CCTV (including in respect of data retention).

All staff accessing operating/using the system must have undertaken Data Protection and Information Security training.

Describe the purposes of the processing

The CCTV system is proportionate and justified. It also achieves for the school the following benefits:

1. demonstrates a duty of care to its pupils, staff, and visitors.
2. protects the School both externally and internally.
3. as a consequence of this budgets can be reduced/deferred to other school projects.
4. encourages improvement pupil behaviour.
5. provides assistance in the detection and prevention of crime.
6. to assist in managing the school.

CCTV system is be referenced in the School's other policies.



Consultation process

Consider how to consult with relevant stakeholders

The CCTV system at the School is neither novel nor disproportional to the purpose. The views of students, parents and staff will be obtained. Once reviewed, the views of these parties will be taken into account when considering whether any adjustments to the School's current CCTV system use are justified.

Assess necessity and proportionality

What is the lawful basis for processing?

The lawful basis for processing is contained in the School's CCTV Policy. The lawful basis includes the following:

- The Common Law Duty of Care
- Safety, Health & Welfare at Work Act 2005
- Education Act 1998

Does the processing achieve your purpose?

Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected.

Is there another way to achieve the same outcome?

Staff are present during all School operational hours; however, this cannot provide an equally constant protection or deterrent which is given by the presence of CCTV monitoring.

How will you ensure data quality and data minimisation?

Consider the source of the data. The School has developed a separate data retention policy which identifies data retention periods for CCTV.

The School will note data retention periods against CCTV as documented in the Information Asset Register.

The School will continue to be compliant with its CCTV Policy.

What information will you give the individuals?

The School will inform pupils, staff and visitors that CCTV is in use by installing signs detailing the scheme and its purpose. The School does have a CCTV Policy

How will you help them support their rights?

The School has a Subject Access Request procedure in place to ensure compliance with Data Protection Law. The School will continue to be compliant with its Data Protection Policy



Identify and assess risks			
Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm (Remote, possible or probable)	Severity of harm (Minimal, significant or severe)	Overall Risk (Low, medium or high)
Loss of data from system either through accidental transfer or deliberate tampering.	Possible	Minimal	Low
Individuals unaware that CCTV is in place.	Remote	Minimal	Low
Function creep – CCTV not used for its original Intention.	Remote	Significant	Medium
Inappropriate use of CCTV.	Remote	Significant	Medium

Identify measures to reduce risk				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Loss of data.	CCTV standalone system sited in a secure location Password protected Authorised personnel only Transfers of data only to police following formal request and clear audit trail of data Data routinely deleted after 28 days.	Reduced	Low	Yes
Individuals unaware that CCTV is in Place.	Clear CCTV policy Signs indicate CCTV in use	Reduced	Low	Yes
Function creep – CCTV not used for its original intention.	Clear CCTV policy regularly reviewed. Any proposed change in use approved by DPO and further DPIA completed.	Reduced	Low	Yes
Inappropriate use of CCTV.	CCTV installed outside in playground to pursue legitimate safeguarding aims of school. Camera installed internally in high-risk areas.	Reduced	Low	Yes

Sign off and record outcomes



Item	Name/date	Notes
Measures approved by: YES		<i>Integrate actions back into project plan, with date and responsibility for completion</i>
Residual risks approved by: YES		<i>If accepting any residual high risk, consult the Data Protection Commission before going ahead</i>
Comments: NONE		
Consultation responses reviewed by:		<i>If your decision departs from individuals' views, you must explain your reasons</i>
Comments:		
This DPIA will be reviewed:	<i>(Specify timescale) Annually</i>	
This DPIA will be kept under review by:		<i>Ongoing compliance with DPIA should be reviewed</i>

