

St. Patrick's N.S.

CCTV POLICY

INTRODUCTION

Closed Circuit Television Systems (CCTVs) are installed in St. Patrick's N.S. to monitor entrances/ exits and the car park. Their operation is reviewed regularly.

PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of the external environs of the premises under the remit of the Board of Management (BoM) of St. Patrick's N.S.

CCTV systems have been installed for the purpose of enhancing security of the building and its associated equipment as well as creating awareness among the occupants, at any one time that a surveillance security system is in operation 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:

1. Protecting the school buildings and school assets, both during and after school hours.
2. Promoting the health and safety of staff, pupils and visitors.
3. Preventing bullying.
4. Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
5. Supporting the Gardaí in a bid to deter and detect crime.
6. Assisting in identifying, apprehending and prosecuting offenders.

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

The BoM of St. Patrick's N.S. has a statutory responsibility for the protection of school property and equipment as well as providing a sense of security to employees, pupils and guests. The *BoM of St. Patrick's N.S.*, 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 is 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.

Information obtained through the CCTV system may only be released when authorised by the Principal, following consultation with the Chairperson of the BoM. Any requests for CCTV recordings/images must be in writing. Legal advice and/or advice from the data protection commissioner will be sought if any such request is made.

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.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student.

All CCTV systems and associated equipment are required to be compliant with this policy following its adoption by the BOM of St. Patrick's N.S. Recognisable images captured by CCTV systems are personal data. They are therefore subject to General Data Personal Regulation (GDPR)

JUSTIFICATION FOR USE OF CCTV

Data Protection legislation requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that the BoM of St. Patrick's N.S. 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 BoM. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

LOCATION OF CAMERAS

The location of cameras is a key consideration. The BoM of St. Patrick's N.S. 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.

St. Patrick's N.S. does not engage in covert surveillance.

Where An Garda Síochána requests the school 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 in writing and the school will seek Data Protection Commissioner/legal advice.

NOTIFICATION – SIGNAGE

This CCTV Policy is available to staff, students, parents and visitors to the school on the school website.

Signage has been placed at entrances to premises and in the reception area.



CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of Saint Patrick's NS and its property.

This system will be in operation 24 hours a day every day.

These images may be passed to An Garda Síochána.

This system is controlled and operated by the Boards of Management of St. Patrick's N.S. and Diswellstown Community and Recreation Centre (DCRC)

For more information contact 01 8249930.



ACCESS, STORAGE & RETENTION

Data Protection legislation states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. Images obtained from CCTV are retained for twenty eight days, except where they identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings are stored in a secure environment. Access is restricted to authorised personnel. (Principal, Deputy Principal, Caretakers). Images recorded after 4pm may be viewed by the manager of Diswellstown Community and Recreation Centre, DCRC which is collocated and shares the CCTV monitoring system with the school. Supervising the access and maintenance of the CCTV System is the responsibility of the BoM. 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 Gardaí, 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).

In relevant circumstances, CCTV footage may be accessed by:

1. An Garda Síochána where St. Patrick's N.S. (or its agents) are required by law to make a report regarding the commission of a suspected crime.
2. The HSE and/or by any other statutory body charged with child safeguarding.
3. The Principal to assist him/her in establishing facts in cases of unacceptable student behaviour.
4. Data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to St. Patrick's N.S.
5. Individuals (or their legal representatives) subject to a court order.
6. The school insurance company where it 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 Chairperson of the BoM. 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 must be made in writing and the school will 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 chairperson of the BoM. The school must respond **within 1 month**.

A person should provide all the necessary information to assist St. Patrick's N.S. 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

RESPONSIBILITIES

The Principal will:

1. Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the *BoM* of St. Patrick's N.S.
2. Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within St. Patrick's N.S.
3. Ensure that all existing CCTV monitoring systems have been evaluated for compliance with this policy.
4. Ensure that the CCTV monitoring at St. Patrick's N.S. is consistent with the highest standards and protections.
5. Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.

6. Maintain a record of access to or the release of any material recorded or stored in the system.
7. Ensure that the perimeter of view from fixed location cameras conforms to this policy.
8. Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events.
9. Give consideration to both students' and staff feedback and/or complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
10. 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".
11. Ensure that access is restricted to authorised personnel only.
12. Ensure that images recorded on tapes/DVDs/digital recordings 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 BoM
13. 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
14. Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
15. Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.
16. Ensure that where An Garda Síochána request to set up mobile video equipment for criminal investigations, Data Protection Commissioner/legal

advice has been obtained and such activities have the approval of the Chairperson of the Board

SECURITY COMPANIES

The school CCTV system is controlled by RMS, a security company contracted by the school BoM. The following applies:

The school has a written contract with the security company in place.

Security companies that place and operate cameras on behalf of clients are considered to be 'Data Processors'. As data processors, they operate under the instruction of data controllers (BoM). Data Protection legislation places a number of obligations on data processors. These include having appropriate security measures in place to prevent unauthorised access to, or unauthorised alteration, disclosure or destruction of, the data, in particular where the processing involves the transmission of data over a network and against all unlawful forms of processing. This obligation can be met by having appropriate access controls to image storage or having robust encryption where remote access to live recording is permitted. Staffs of the security company have been made aware of their obligations relating to the security of data. See Third Party Service Agreement for further guidance.

IMPLEMENTATION & REVIEW

This 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 BoM. Implementation of the policy will be monitored by the Principal of the school.



Signed:
For and behalf of Board of Management

Date: Ratified: 08/04/ 2019.