



CCTV POLICY

Ratified by Board of Management: 19th November 2018

Signed: _____

Chairperson

1. Introduction

Closed Circuit Television Systems (CCTVS) are installed in St. Brigid's G.N.S.

New CCTV systems will be introduced in consultation with staff, the BoM and the parents' association. Where systems are already in operation, their operation will be reviewed regularly in consultation with staff, the BoM and the parents' association.

1. Purpose/Rationale 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 of St. Brigid's G.N.S.

CCTV systems are installed externally in the premises for the purpose of enhancing the security of the building and its associated equipment as well as creating a mindfulness among the occupants 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. reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
4. supporting the Gardaí in a bid to deter and detect crime;
5. assisting in identifying, apprehending and prosecuting offenders; and

2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

4. General Principles

The Board of Management of St. Brigid's G.N.S. as the corporate body has a statutory responsibility for the protection of its property, equipment and other plant as well as providing a sense of security to its employees, students and invitees to its premises. The Board of Management owes a duty of care to the school community under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation. CCTV systems and their associated monitoring and recording equipment are utilised as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community.

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 performance.

Information obtained through the CCTV system may only be released when authorised by the Principal, following consultation with the Chairperson of the Board of Management. Any requests for CCTV recordings/images from An Garda Síochána will be fully recorded and legal advice from the data protection commissioner/legal advice will be sought if any such request is made. (See "Access" below).

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, 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 Board of Management. Recognisable images captured by CCTV systems are personal data. They are therefore subject to the provisions of the Data Protection Acts 1988 to 2018.

6. 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. 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.

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

7. Location of Cameras

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. The Board of Management of St Brigid's G.N.S has endeavoured to select locations for the installation of CCTCV 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. Cameras are located at 10 strategic areas around the schools environs.

8. Covert Surveillance

St. Brigid's G.N.S. 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 Data Protection Commissioner/legal advice

9. Notification – signage

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 BoM.

Adequate signage is placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage is prominently displayed at the entrance door to *St. Brigid's G.N.S* property. This signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

10. 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. Accordingly, the images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue

The images/recordings are stored in a secure environment with a log of access kept. Access is restricted to authorised personnel including the Principal and the Deputy Principal. Supervising the access and maintenance of the CCTV System is the responsibility of the BoM. The Principal is responsible for the administration of the CCTV System. 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). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

11. Access

There are two monitors in operation – one in the secretary's office (viewing only) and one in the store room behind the office. The control system is stored in the store room behind the office. This area will be locked when not occupied by authorised personnel. A log of access to tapes/images will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. the Principal/Deputy Principal of the school.

In relevant circumstances, CCTV footage may be accessed:

1. By An Garda Síochána where St Brigid's G.N.S(or its agents) are required by law to make a report regarding the commission of a suspected crime; or
2. 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 St Brigid's G.N.S property, or
3. By the HSE and/or by any other statutory body charged with child safeguarding; or
4. To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to *St Brigid's G.N.S* or
5. To individuals (or their legal representatives) subject to a court order
6. 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

12. 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 Board of Management. 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.

13. Access requests:

On written request (using Appendix 1 attached), 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 must respond within 1 month.

Access requests can be made to the following: The Principal, St Brigid's G.N.S., Old Finglas Road, Glasnevin, Dublin 11.

A person should provide all the necessary information to assist St Brigid's G.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

In giving a person a copy of their data, the school may provide a still/series of still pictures or a device with relevant images. However, other images of other individuals will be obscured before the data is released.

14. Roles and Responsibilities

| Name | Responsibility |
|----------------------|----------------------------------|
| Board of Management: | Data Controller |
| Principal: | Data Protection Officer |
| Secretary: | Security and Confidentiality |
| School Community: | Maintain awareness and implement |
| AIMS Security Ltd. | Maintenance of CCTV system |

The Principal will:

1. Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the Board of Management of St Brigid's G.N.S.
2. Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within St Brigid's G.N.S.
3. Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
4. Ensure that the CCTV monitoring at St Brigid's G.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 (e.g. an access log) to or the release of any material recorded or stored in the system
7. Ensure that monitoring recorded images are not duplicated for release
8. Ensure that the perimeter of view from fixed location cameras conforms to this policy
9. 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 Síochána]*
10. 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
11. 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
12. Co-operate with the Health & Safety Officer of St Brigid's G.N.S. in reporting on the CCTV system in operation in the school
13. Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing most notably Addison apartments and comply with the principle of "Reasonable Expectation of Privacy"
14. Ensure that monitoring digital recordings are stored in a secure place with access by authorised personnel only
15. Ensure that images recorded on digital recordings are stored for a period not longer than 30 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
16. Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics

17. Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

18. 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

15. Supporting Policy

- Data Protection Policy
- SPHE Policy

15. Ratification & Communication

This Policy was ratified by the Board of Management on 19th November 2018 and is available from the school on request and also available to download on the school website www.stbrigid.ie

16. Review Timetable

The BOM will monitor this Policy's implementation and will review it again, on or before November 2021, or as the need arises. 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.

APPENDIX 1

Data Access Request Form

**Request for a copy of Personal Data under the Data Protection Act 1988 and
Data Protection (Amendment) Act 2003**

Date issued:

Important: Proof of Identity must accompany this Access Request Form (e.g. official/State photographic identity document such as driver's licence, passport).

| | |
|--|-------------------|
| Full Name | |
| Maiden Name (if name used during your school duration) | |
| Address | |
| Contact number * | Email addresses * |

* We may need to contact you to discuss your access request

Please tick the box which applies to you:

| | | | | |
|--------|----------------------------|----------------|---------------|-----------------------|
| Pupil | Parent/Guardian of student | Former Student | Current Staff | Former Staff |
| Age: | Name of Student: | Year leaving: | | Insert Years From/To: |
| Class: | | | | |

Section 3 Data Access Request:

I,[insert name] wish to be informed whether or not *St. Brigid's GNS* holds personal data about me/my child and to be provided with a description of this data and to be informed of the purpose for holding such data. I am making this access request under **Section 3** of the Data Protection Acts.

OR

Section 4 Data Access Request:

I, [insert name] wish to make an access request for a copy of any personal data that *St. Brigid's GNS* holds about me/my child.

I am making this access request under **Section 4** of the Data Protection Acts.

In the case of an access request for recorded data please provide the following information:

| | |
|----------------------------------|--|
| Date | |
| Time | |
| Location of the Recording | |

Signed

Date

To the Chairperson of Board of Management