

St. Joseph's N.S., Leitrim Village, Roll No: 01125B

CCTV Policy

1. PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed Circuit Television (CCTV) and its associated technology in the monitoring the external environs of the premises under the remit of St. Joseph's N.S. The operation of this CCTV will be reviewed regularly in consultation with staff, the Board of Management and the Parents Association.

CCTV systems are installed externally at St. Joseph's N.S., 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 in the external environs of the premises. CCTV surveillance at the School is intended for the purposes of:

- protecting the school buildings and school assets
- promoting the health and safety of staff, pupils and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Gardaí in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders;

The CCTV system shall not be used to monitor staff and or pupils.

2. Scope

This policy applies to all personnel and visitors to St. Joseph's N.S. and relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

3. GENERAL PRINCIPLES

The BOM of St. Joseph's N.S. as the corporate body has a statutory responsibility for the protection of its property and equipment as well providing a sense of security to its employees, students and invitees to its premises. The BOM of St. Joseph'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 primary aim of the CCTV monitoring of St. Joseph's N.S. premises is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy. For example, CCTV monitoring of political or religious

activities, or employee and/ or student evaluations would undermine the acceptability of the resources for use regarding critical safety and security objectives and is therefore prohibited by this policy.

Information obtained through the CCTV system may only be released when authorised by the Chairperson of the Board of Management. Any requests for CCTV recordings/images from An Garda Síochána 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 Síochána, is seeking a recording for a specific investigation, An Garda Síochána may require a warrant and accordingly any such request made by An Garda Síochána 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 BOM of 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 the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the BOM of St. Joseph's N.S. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts 1988 and 2003. **Data from the CCTV system will be accessed and used in accordance with Data Protection Regulations.**

4. JUSTIFICATION FOR USE OF CCTV

The use of CCTV in St. Joseph's N.S. is 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, including P.E. lessons outside on the school yard and pupils playing during break times.

5. LOCATION OF CAMERAS

The BOM of St. Joseph'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. All cameras are externally located. The main locations of the cameras are: -

- To the front of the main building
- To the rear of the main building
- Each side of the main building

CCTV Video Monitoring and Recording of Public Areas in St. Joseph's N.S. may include the following:

- *Protection of school buildings and property:* The building's perimeter
- *Criminal Investigations (carried out by An Garda Síochána):* Robbery, burglary and theft surveillance

6. COVERT SURVEILLANCE

St. Joseph's 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 legal advice.

7. 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 will also be uploaded to the school website. 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.

Signage will be erected at the front of the school, clearly visible to everyone entering school grounds and at the rear of the school, to indicated the presence of CCTV cameras on school grounds. Staff and parents/ guardians will be informed of the location and purposes of the CCTV system outlined above. The right to access images captured by CCTV cameras shall be in accordance with Data Protection Acts 1998 and 2003 and as per this policy.

8. STORAGE & RETENTION

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.

CCTV footage is automatically deleted after 28 days. Any subsequent footage downloaded and no longer required will be destroyed in accordance with Data Protection regulations and this will also be noted in the log book. CCTV footage that is required by an Garda Síochána as part of a criminal investigation or court proceedings, criminal or civil, will be stored securely until all proceedings are complete and as per Data Protection regulations on storage and retention of Data.

The images/recordings will be stored in a secure environment (The Principal's Office) with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Principal.

9. ACCESS

The recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The 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. Principal of school.

In relevant circumstances, CCTV footage may be accessed:

- By An Garda Síochána where St. Joseph's N.S., (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 St. Joseph's N.S. property, 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 St. Joseph's N.S., 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 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.

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 Chairperson of BOM, using the attached CCTV Data Subject Access Request Form (Appendix A). The school may charge up to €6.35 for responding to such a request and must respond **within 40 days**.

Access requests can be made on the CCTV Data Subject Access Request Form, to the following: Chairperson BOM, St. Joseph's N.S., Leitrim Village, Carrick-on-Shannon, Co. Leitrim.

A person should provide all the necessary information to assist St. Joseph's N.S. in locating the CCTV recorded data, such as the date, time and location of the recording, as per request

form. 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.

The Chairperson of the BOM will be responsible for the release of any information or material in compliance with this policy.

10. RESPONSIBILITIES

The BOM will:

- Ensure that a policy is in place, compliant with relevant legislation, to govern the use of CCTV in the school
- Ensure this policy is reviewed regularly by the BOM

The Principal will:

- Act as Data Controller on behalf of the BOM. In carrying out the role of Data Controller the principal will report any matters arising to the BOM
- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by St. Joseph's N.S.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within St. Joseph's N.S.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at St. Joseph's N.S. is consistent with the highest standards and protections
- Review camera locations
- 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
- 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 St. Joseph's N.S. 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 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 Chairperson of 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 Chairperson of the Board.

11. LINKS TO OTHER SCHOOL POLICIES

All school policies are consistent with one another, within the framework of the overall School

Plan. Relevant school policies already in place, being developed or reviewed, are examined with reference to the CCTV Policy and any implications which it has for them are addressed.

The following policies are among those considered:

- Data Protection Policy
- Child Safeguarding Statement
- Anti Bullying Policy
- Health and Safety Policy and Statement
- Code of Behaviour
- Mobile Phone and Electronic Devices Policy
- ICT and Acceptable Usage Policy

The CCTV Policy has been developed mindful of the school's obligation under Data Protection Legislation.

12. IMPLEMENTATION, RATIFICATION, COMMUNICATION & REVIEW

The school Principal is assigned the role of co-ordinating the implementation of this CCTV Policy and for ensuring that all members of the school community are familiar with the Policy. This policy will be implemented in full once it has been ratified by the BOM.

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.

Practical indicators that will be used to gauge the impact of the impact and the effectiveness of the policy will include the extent to which:

- Staff and parents/guardians are aware of the policy.
- Request for access to CCTV data are dealt with effectively and in accordance with legislation and school policy.
- CCTV data records are held securely.

St. Joseph's N.S., Leitrim Village, Roll No: 01125B

- CCTV data records are only retained for as long as necessary.

Once ratified this policy will be uploaded to the school website. A hard copy will be made available to view on request. Staff members will be given an electronic copy of this policy on their school plan memory stick.

This policy was ratified by the Board of Management on the 08/03/2018. This policy supersedes all previous practices in relation to the school's CCTV System and CCTV Data Management and will be implemented with immediate effect.

Signed: _____ Date: _____

Chairperson of BOM

Signed: _____ Date: _____

Principal

Appendix 1: Signage

The following sign is displayed in two locations on external walls of the school building.

