

Cabinteely Community School



CCTV Policy

Ratified June 2023

1. School Mission Statement

Cabinteely Community School is a kind, caring and vibrant learning community which supports the wellbeing and the academic, spiritual and creative growth of every student.

We welcome students of all ethnicities, abilities, genders and faith traditions, as equal members of our community

We identify with our Ursuline founders and their love of education.

Our Core Values

Our core values guide our policies, our procedures and how we work with our staff and students. These core values are;

Care - We all need to belong and be cared for in a safe environment in order to learn

Courage - We show courage by making the right choices and committing to learning

Support - We will be the best we can be by working hard and working together

2. 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 both the internal and external environment of the premises under the remit of Cabinteely Community School.

CCTV systems are installed (both internally and externally) on the 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 environment at the premises during both the daylight and night hours each day. CCTV surveillance at Cabinteely Community School is intended for the purposes of:

- Promoting the health and safety of staff pupils and visitors
- protecting the school buildings and school assets, both during and after school hours
- preventing bullying
- 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
- ensuring that the school rules are respect to the school can be properly managed

3. Scope

This policy relates to all personnel in and all visitors to Cabinteely Community School. It relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of each recorded material.

4. General Principles

The Board of Management 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 visitors to its premises. The school owes a duty of care under the provisions of Safety, Health and Welfare legislation and associated legislation and utilizes 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 aims of the CCTV monitoring at the school is to ensure the health and safety of students and staff, to deter crime and vandalism and to assist in the protection and safety of the said property and its equipment and materials.

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 or political or religious activities.

5. CCTV policy at Cabinteely Community School

Information obtained through the CCTV system may only be released when authorised by the Principal. Consultation may take place with the Chairperson of the Board of Management if this is deemed necessary by the Principal.

Any requests for CCTV recordings/images from An Garda Síochána will be recorded and legal advice may be sought if any such requests are made.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Board of Management including provisions set down in Equality and other Education 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.

Data from the CCTV system will be accessed and used in accordance with the Data Protection Act.

6. Justification for use of CCTV

Section 2(1)(c)(iii) of the Data Protection Act requires that it is “adequate, relevant and not excessive” for the purpose for which it is collected.

7. Non-Use of CCTV

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

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

8. Location of Cameras

Cabinteely Community School has endeavoured to select locations for the installation of CCTV cameras with your 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 Cabinteely Community School include the following:

- **Protection of school buildings and property:** the building's perimeter, entrances and exits, lobbies and corridors
- **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:** main entrance/exit gates, traffic control
- **Criminal Investigations (carried out by An Garda Síochána)** robbery, burglary and theft surveillance

9. Notification - Signage

The Principal will make a copy of this CCTV policy available on the school website and on the school app for students, parents/guardians and visitors to the school. A copy will also be available in the Teams Notebook called "CCS Policies" for staff. The location of CCTV cameras will also be indicated to the Board of Management. Adequate signage will also be prominently displayed at the entrance to Cabinteely Community School property.

Appropriate locations for signage will include:

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

10. Storage and Retention

Section 2(1)(c)(iv) of the Data Protection Act 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. Personal data recorded by the CCTV system shall be retained for a maximum of 28 days, except where the images 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.

11.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 digital recordings will be maintained. Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. the API with responsibility for ICT, the Deputy Principal and the Principal of the school.

In relevant circumstances, CCTV footage may be accessed:

- To assist the Principal/Deputy Principal in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- By An Garda Síochána where Cabinteely Community School 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 Cabinteely Community School 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 Cabinteely Community School
- To individuals (or their legal representatives) subject to a court order.
- To the school 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 Principal. The request is free of charge and will be responded within 1 month of receipt of your request.

Access requests can be made to the following:

The Principal,
Cabinteely Community School,
Cabinteely,
D18 VH73.

A person should provide all the necessary information to assist Cabinteely Community School 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.

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

12. Responsibilities

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Cabinteely Community School
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Cabinteely Community School
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Cabinteely Community School 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 Síochána].
- 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 Tallaght Community School 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 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

13.Security Companies

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

The school has a written contract with the security company in place which details the areas to be monitored, how long data is to be stored, what the security company may do with the data, what security standards should be in place and what verification procedures apply.

The written contract also states that the security company will give the school all reasonable assistance to deal with any subject access request made under EU General Data Protection Regulation of 2016/679 (GDPR) which may be received by the school within the statutory time-frame (generally 40 days).

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 (their clients). Under EU General Data Protection Regulation of 2016/679 (GDPR) place 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. Staff of the security company have been made aware of their obligations relating to the security of data. See Content of the Service Agreement for further guidance.

14.Implementation & Review

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.

This CCTV Policy was adopted by the Board of Management on 6 June 2023.

Signed: _____

Signed: _____

Chairperson of Board of Management
Management

Principal/Secretary to the Board of

Date: _____

Date: _____

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 and a limited set of monitors. The images may then be recorded on videotape or DVD or other digital recording mechanisms.

The Data Protection Act : the Data Protection Act 2018 confers 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 Act when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals to 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.

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 outsources work. The Data Protection Act replaces responsibilities on such entities in relation to their processing of the data.

