

# **Scoil Mhuire Gan Smal (Creagh NS)**

## **Policy on CCTV System and CCTV Data Management**

The Closed Circuit Television System (CCTV) is installed in Creagh National School/Scoil Mhuire Gan Smal under the remit of the Board of Management.

### **Purpose of the Policy**

The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of the environs of premises **under the remit of the Board of Management of Creagh National School.**

### **Purpose of the CCTV System**

The CCTV system is installed externally 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 to deter crime, vandalism and theft, and as an aid to Health and Safety. The CCTV system shall not be used to monitor staff and or pupils.

### **Scope of this policy**

This applies to all personnel and visitors to Creagh National School. It relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

### **General Principles**

The Board of Management of Creagh National School, as the corporate body, has a statutory responsibility for the protection of the school property and equipment as well as providing a sense of security to its employees, students and invitees to its premises. Creagh National School owes a duty of care under the provision of Health and Safety and Welfare legislation and utilises CCTV systems and its associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life in Creagh National School by integrating the best practices governing the surveillance of its premises.

**The primary aim of the CCTV monitoring of Creagh National School 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 video monitoring may only be released when authorised by the **Chairperson** of The Board of Management.

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 the provisions set down in Equality and other Education related legislation.

The industry code of practice for video monitoring prohibits monitoring based on the classifications contained in Equality and other related legislation e.g. gender, marital status, family status, sexual orientation, religion, age, disability, or race.

Video monitoring of public areas, for security purposes, within Creagh National School, is limited to areas that do not violate the reasonable expectation to privacy as defined by law.

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

**Cameras will be located in the following areas:**

Please note there are no internal cameras installed in Creagh NS.

### **External**

The location of the CCTV cameras is highlighted on a map of the school grounds. The following are the broad areas covered by the external cameras:

1. To the front of the main building
2. To the rear of the main building
3. Astro Turf Playing Pitch Area

Signage will be erected at the main entrance areas to indicate the presence of CCTV cameras on the school grounds. Staff and parents/guardians will be informed of the location and purpose of the CCTV system as outlined above. The right to access images captured by CCTV cameras shall be in accordance with the Data Protection Acts of 1998 and 2003 and as per this policy.

## **Storage of Recorded Footage and Monitoring Equipment**

The recorded footage and monitoring equipment is stored in the Communications Rooms which is locked at all times. The Log Book which records release of CCTV data to authorised persons is also stored in this room. An additional monitor (which cannot record) is located in the Secretary's Office. This office is also locked when unoccupied.

## **Retention of CCTV Footage**

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 criminal investigations 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.

## **Data Protection**

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1998 and 2003. Under the Data Protection Acts a data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information in manual files or in a computerised form. The data controller in respect of images recorded and stored by the CCTV system in the school is the Principal on behalf of The Board of Management. The personal data recorded and stored by the CCTV system will only be available to the data controller and the Chairperson of the Board of Management and it will be used only for the purposes outlined in this policy.

## **CCTV Data Subject Access Request**

Individuals whose images are recorded and stored by the CCTV system shall have the right to request and receive a copy of personal data processed by the system. Such requests shall be made in writing using the template provided (**Appendix A**) to the Chairperson of the Board of Management. All of the information required is detailed in **Appendix A CCTV Data Subject Access Request**. 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 as per Data Protection regulations. All requests shall be complied with within a maximum of 40 days. **The Chairperson of the Board of Management will be responsible for the release of any information or material in compliance with this policy.**

The following procedures shall be followed in the event that An Garda Síochána seeks to view or take a copy of CCTV footage from the school's CCTV systems:

1. The Chairperson of the BOM and Data Controller shall satisfy himself/herself that there is an investigation underway and this will suffice.
2. All such requests will be noted in the Log Book.

## **Responsibilities**

### **The Board of Management 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 Board of Management.

### **The Principal will:**

- Act as Data Controller on behalf of the Board of Management. In carrying out the role of Data Controller, the Principal will report any matters arising to the Board of Management.
- Ensure that the use of the CCTV system is used in accordance with the policy set down by the Board of Management.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school.
- Ensure that all CCTV monitoring systems are compliant with this policy.
- Maintain a record of the release of any material recorded or stored on this system. This record will be kept in a Log Book.
- Provide a list of the CCTV cameras, their locations and the associated monitoring equipment and the capabilities of such equipment to the Board of Management for formal approval.
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events.
- Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the school.
- Advise the Board of Management to ensure that adequate signage, at appropriate and prominent locations, is displayed.
- Ensure that external cameras are not intrusive in terms of their positions and views of residential housing and comply with the principle of “reasonable expectation of privacy”.
- Ensure that monitors are stored in a secure place with access by authorised personnel only.

### **Links to other policies and curriculum delivery**

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 Protection Policy
- Anti Bullying Policy including Anti Cyber Bullying Policy
- Health and Safety Policy and Statement
- Code of Behaviour
- Use of Mobile Phone Policy
- ICT Acceptable Usage Policy

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

### **Implementation Arrangements, Roles and Responsibilities**

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.

### **Ratification and Communication**

A draft copy of this policy was circulated to staff and parents for review and comment through the school website. All parents/guardians were advised of the availability of a hard copy of the policy through the Secretary's office.

The ratified policy is now available on the school website [www.creaghns.com](http://www.creaghns.com)

A hard copy is available to view in the secretary's office on appointment.

Staff members are required to be familiar with the CCTV Policy.

### **Monitoring the implementation of the policy**

Ongoing review and evaluation of the policy will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or the NEWB) and legislation. This policy will be revised as necessary in light of such review and evaluation and within the framework of school planning.

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

**Implementation date**

Ratified by the Board of Management on the 25/09/2017. 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.

**Timetable for Review**

Four years from the date of ratification (2017).

Please refer also to the section on **"Monitoring the implementation of the policy"**

Signed: \_\_\_\_\_

**Mr Frank Gallagher, Acting Chairperson**

On behalf of the Board of Management of SN Muire Gan Smál (Uimhir Rolla 17198S)

**Date September 25th 2017**