

Old Bawn Community School

POLICY ON CCTV SYSTEMS & DATA MANAGEMENT

Closed Circuit Television System (CCTV) is installed in Old Bawn Community School under the remit of the Board of Management.

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 internal environs of premises under the remit of the B.O.M. of Old Bawn C.S.”

Nine external cameras are used for a monitored alarm during the time the school is closed. During this time these cameras are under the control of A.D.T.

Purpose of CCTV Systems:

CCTV's are installed internally and externally in 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 to deter bullying, crime, vandalism and theft as an aid to Health and Safety and to the discharge of the school's duty of care within and/or in the external environs of the premises during both the daylight and night hours each day.

Scope of Policy:

This policy applies to all personnel in and visitors to Old Bawn C.S. and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

General Principles:

The B.O.M. of Old Bawn C.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. Old Bawn C.S. owes a duty of care under the provision of Health, 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 of Old Bawn C.S. by integrating the best practices governing the surveillance of its premises.

The primary aim of CCTV monitoring Old Bawn C.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 e.g., 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 authorized by the Principal, following consultation with 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 B.O.M. including Non-discrimination Policy, Bullying and Harassment in the Workplace Policy, Sexual Harassment Policy and other relevant policies 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 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 the said establishment, is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

The Principal will periodically provide written material describing the purpose and location of CCTV monitoring and guidelines for its use. The location of outdoor CCTV cameras will also be indicated to the Board. Data from C.C.T.V. system will be accessed and used in accordance with Data Protection Regulations.

Cameras will be located in the following areas:

Internal

- 17 cameras located to monitor the corridors, social areas, upper assembly, Art lobby, McMahon Library, main entrance, Principal's office and General office.

External

- 8 cameras located to monitor the car park, main entrance, bike shed and gate.
- 9 cameras to protect the perimeter of the school building.

Signage will be erected in each location in which a camera is located. The signage will include the name and contact detail of the data controller as well as the specific purposes for which the CCTV camera is in place in each location.

- i.e.
- To deter/detect bullying
 - To deter/detect crime, theft and vandalism
 - To ensure compliance with school's Code of Behaviour
 - As an aid to security
 - For Health & Safety purposes
 - To enable the school to discharge its duty of care.

Ad hoc camera locations to deal with specific issues with the approval of the Board of Management

Staff, students and parents/guardians will be informed of the existence and purposes of the CCTV system as outlined above. The right of access for students and staff to images captured by CCTV cameras shall be in accordance with the Data Protection Acts 1998 & 2003 as outlined below.

Data Protection:

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts, 1988 & 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 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 Principal may delegate this responsibility to the Deputy Principal when needed.

The personal data recorded and stored by the CCTV system will only be available to the data controller and will be used only for the purposes outlined on the signage. The C.C.T.V. system shall not be used to monitor staff performance or conduct.

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 to the data controller and shall be complied with within a maximum of 40 days.

Personal data recorded by the CCTV system shall be retained for a maximum of 28 days. Thereafter, it will be deleted automatically

The recorded footage and the monitoring equipment shall be securely stored in the Principal's office. Unauthorised access to that office is not permitted at any time. The office is locked when not occupied by the Principal.

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

- 1. The data controller shall satisfy himself/herself that there is an investigation underway by telephoning the Garda Station of the requesting Garda and speaking to the Station Sergeant or higher or to a member in the District Office.**
- 2. A request from An Garda Síochána must be made in writing on Garda headed notepaper.**

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the B.O.M.

Responsibilities:

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the B.O.M.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Old Bawn C.S. is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or material in compliance with this policy
- Maintain a record of the release of discs or any material recorded or stored in the system
- Ensure that material is not duplicated for release
- Ensure that the perimeter view from fixed location cameras conform to this policy both internally and externally
- Provide a list of the CCTV cameras and the associated monitoring equipment and the capabilities of such equipment, located in the school 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

NOTE: (Temporary Cameras does not include mobile video equipment or hidden surveillance cameras used for criminal investigations)

- Give consideration to and refer to the B.O.M. both students and staff petitions 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
- Advise the Board to ensure that adequate signage, at appropriate and prominent locations is displayed and include the following in such signage

“This area is subject to Video Monitoring by the School Management Authority”

- Ensure that external cameras are non 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 authorized personnel only
- Ensure that recorded material is retained for period not longer than 28 days and will then be erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the B.O.M.,
- Ensure that camera control is solely to monitor suspicious behaviour and not individual characteristics.
- Ensure that camera control is not in breach of the intrusion on intimate behaviour by persons in public areas.
- Ensure that mobile video equipment will only be used for criminal investigations and with the approval of the B.O.M. and/or the local Garda Authorities.

DATA MANAGEMENT

Disclosure:

- Parental consent will be sought before transfer of student data to the Dept. of Education & Science. This consent to be sought at time of enrolment by means of a field on the enrolment form.
- All documents supplied to B.O.M. members containing personal data must be collected and shredded at the end of each meeting.

Data Retention:

Please see Data Protection Policy

I.C.T.

All I.T. support and maintenance contracts must have clear data protection provision.

Offices:

Access to the main office will be restricted to the office staff, the Principal and Deputy Principal. To ensure this the office door must be fitted with a key pad.