

Claddaghduff N.S Policy on CCTV System and Data Management

A Closed- Circuit Television System (CCTV) is installed in Claddaghduff N.S 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 Claddaghduff N.S.

Purpose of the CCTV System

The CCTV system (4 cameras) are installed 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 to deter crime, vandalism, theft, and bullying, as an aid to the promotion of high-quality Health and Safety standards and to the discharge of the school's duty of care within and/or in the external environs of the premises at all times.

Scope of this policy

This policy applies to all staff, pupils, and visitors to Claddaghduff N.S. 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 Claddaghduff N.S, 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. Claddaghduff N.S owes a duty of care under the provisions of Health, Safety and Welfare legislation and utilises the CCTV system 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 Claddaghduff N.S by integrating the best practices governing the surveillance of its premises.

The primary aim of the CCTV system in Claddaghduff N.S 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.

Information obtained through video monitoring may only be released when authorised 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 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, race or membership of the Traveller community.

Video monitoring of public areas, for security purposes, within Claddaghduff N.S 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 are located in the following areas:

External

- The front left external wall of the school- covering the entrance to the school and yard equipment
- The front right external wall of the school- covering the school gate access and yard equipment
- The rear left external wall covering the sheds and bin area
- The rear right external wall covering the small football area, school exit door and back of school

Signage is at the school entrance gate and front door advising that a CCTV System is in operation at the school.

Staff, pupils and parents/guardians are 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 Claddaghduff N.S Data Protection Policy.

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 will be used only for the purposes outlined in this Policy.

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 31 days. Thereafter it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in the Principal's and Secretary's Office area. Unauthorised access to those Offices is not permitted at any time. The Offices are secured by being locked daily.

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 data controller shall satisfy himself/herself that there is an investigation underway
2. A request from An Garda Síochána must be made in writing on Garda Síochána headed notepaper.

All CCTV systems and associated equipment are required to be compliant with this Policy.

Responsibilities:

The *Board of Management* will:

- Ensure that the CCTV 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
- Ensure that the use of the CCTV system is used in accordance with this Policy as 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
- Be responsible for the release of any information or material in compliance with this Policy

- Maintain a record of the release of any material recorded or stored on this system
- 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
- If required, 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 recorded material is retained for a period not longer than 31 days and will 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 Board of Management
- Ensure that monitors are stored in a secure place with access by authorised personnel only.

Links to Other Policies and to 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
- Code of Behaviour
- 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 implementation of this CCTV Policy and for ensuring that all members of the school community are familiar with the Policy.

Ratification & Communication

This Policy was circulated to all staff and BoM members and to the officers of the P. A for review and comment. The CCTV Policy was ratified by the BoM at its meeting on 23rd October 2023.

The ratified Policy was circulated by email to all staff members and to the officers of the P.A. All parents were advised of the availability of the Policy on the school website at Claddaghduff N.S Blog and of the availability of a hard copy of the Policy for perusal through the Secretary's Office. Staff members are required to be familiar with the CCTV Policy.

Implementation Date

Implementation of the Data Protection Policy commenced with effect from 19th June 2019 and was updated on 23rd October 2023.

Monitoring the implementation of the Policy

Staff and Board of Management members will satisfy themselves on an on-going basis that the actions/measures set down under the Policy are being implemented.

Reviewing and evaluating the Policy

Ongoing review and evaluation of this Policy will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and Skills or the NEWB), legislation and feedback from parents/guardians, students, school staff and others. The Policy will be revised as necessary in the light of such review and evaluation and within the framework of school planning.

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

- Students, staff and parents/guardians are aware of the policy
- Requests for access to personal data are dealt with effectively
- Personal data records are held securely
- Personal data records are retained only for as long as necessary.

Signed: *Fáiméal MacKerrin*

Chairperson BOM

Signed: *Laura Griffin*

Principal

Date: 23rd October 2023