

CCTV System Policy of The High School

1. Introduction

1.1 The purpose of the CCTV System Policy of The High School (“the Policy”) is to regulate the management, operation and use of the closed circuit television (CCTV) system (“the System”) at The High School (“the School”).

1.2 The system comprises a number of fixed and dome cameras located around the school site. The Policy follows Data Protection Commissioner guidelines and is drafted in conformity with the Data Protection Acts 1988-2003 (“the Acts”).

1.3 Comments from interested parties are welcome and will be considered when the policy is reviewed.

1.4 The System is wholly owned by the School.

2. Objectives of the System

- 2.1
- (a) To protect the school buildings and their assets,
 - (b) To increase personal safety of staff, pupils and visitors and reduce the fear and incidence of crime,
 - (c) To support the Gardai in a bid to deter and detect crime,
 - (d) To assist in identifying, apprehending and prosecuting offenders,
 - (e) To protect members of the public and private property,
 - (f) To assist in managing the School,
 - (g) To assist in relation to matters other than security, namely, the promotion of and compliance with Health and Safety standards and taking appropriate disciplinary measures, where so required.
 - (h) The System will not be used to monitor staff conduct or performance, except where required to investigate the alleged commission of a crime.

3. Statement of intent

3.1 The School will treat the System and all information, documents and recordings obtained and used therefrom as data which may be deemed personal data requiring protection under the Acts.

3.2 Cameras will be used to monitor activities within the school circulation areas and its car parks and other public areas as an adequate, relevant and proportionate response to the achievement of the objectives identified at paragraph 2.1.

3.3 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property. Where necessary filters have been used

3.4. Unless an immediate response to events is reasonably required, staff must not directly focus cameras singularly at an individual, their property or a specific group of individuals, without an authorisation being obtained using the school’s forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

3.5 Materials or knowledge secured as a result of the use of the System will not be used for any commercial purpose. The recorded images shall be stored on DVDs which will only be released to the media or other third parties for use in the investigation of a specific crime and with the written authority of the Garda Síochána. DVDs containing personal data will never be released to the media or other third parties for any purpose that is not permitted under the Policy without the Data Subject’s consent.

3.6 The planning and design of the System has endeavoured to ensure that it will give maximum effectiveness and efficiency insofar as is reasonably practicable but it is not possible to guarantee that the System will cover or detect every single incident taking place in the areas of coverage.

3.7 Warning signs, as required by the Code of Practice of the Data Protection Commissioner have been placed at all access routes to areas covered by the school CCTVs to inform all persons who may be deemed Data Subjects, of the operation of the System

4. Operation of the system

4.1 For the purposes of the Data Protection Acts 1988-2003 the Data Controller will be The High School. In practice, the System will be managed by the Principal, in accordance with the principles and objectives expressed in the Policy.

4.2 The day-to-day management will be the responsibility of the Administrator to be approved by the Principal. Other personnel may also be authorised by the Principal to view recorded images for the purposes outlined in this policy, e.g. the Deputy Principal.

4.3 The School Sargeant's office (referred to in 6 below) will only be staffed by the School's authorised security and caretaking staff who shall also adhere to the Policy.

4.4 The System will be operated 24 hours each day, every day of the year, except for periods of breakdown or necessary maintenance

5. Control Room

5.1 The Administrator's office is where the system is installed and from where it is controlled. The Administrator will check and confirm the efficiency of the System regularly and in particular that the equipment is properly recording and that cameras are functional. The recording equipment is located in a locked cabinet in the Administrator's office. The key will be held by the Administrator.

5.2 Access to the Administrator's office will be limited to the authorised people while recorded data is being viewed.

5.3 If out of hours emergency maintenance arises, the security staff must be satisfied of the identity and purpose of contractors before allowing access to the Control cabinet.

5.4 During the working day when the Administrator's office is not manned the Control cabinet will be kept locked.

5.5 Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. Monitoring procedures

6.1 Camera surveillance will be maintained at all times.

6.2 Monitors are installed in the following areas and will be used only in accordance with this policy:

(a) Administrator's office

(b) Principal's office

(c) Deputy Principal's office

(d) School Sargeant's office at front door of main school building – this monitoring station also contains equipment for directing cameras which will be used only in accordance with this policy. There is no recording equipment at this location.

7. Video recording procedures

7.1 Recordings are initially made to a hard disk which is located in the locked Control cabinet in the Administrator's office. The equipment is programmed to delete images after 28 days

automatically. Data can be recorded on to DVDs for specific purposes in accordance with this policy and with the authorisation of the Principal. Such DVDs will be stored in the locked Control cabinet.

7.2 In order to maintain and preserve the integrity of the DVDs used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- (i) Each DVD must be identified by a unique mark.
- (ii) Before use each DVD must be cleaned of any previous recording.
- (iii) The Administrator shall register the date and time of DVD insert, including DVD reference.
- (iv) A DVD required for evidential purposes must be sealed, witnessed, signed by the Administrator, dated and stored in a separate and secure, safety container. If a DVD is not copied for the Gardai before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the Administrator, dated and returned to the evidence DVD store.
- (v) If the DVD is archived the reference must be noted.

7.3 DVDs may be viewed by the Gardai for the prevention and detection of crime

7.4 A record will be maintained of the release or viewing of DVDs to the Gardai or other authorised persons. A register will be maintained for this purpose.

7.5 Should a DVD be required as evidence, a copy may be released to the Gardai under the procedures described in paragraph 7.1 (iv) of the Policy. DVDs will only be released to the Gardai on the clear understanding that the recording remains the property of the School, and both the DVD and information contained on it are to be treated in accordance with this code. The School also retains the right to refuse permission for the Gardai to pass to any other person the DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence DVD store, complete in its sealed bag.

7.6 The Gardai may require the school to retain the stored DVDs for possible use as evidence in the future. Such DVDs will be properly indexed and properly and securely stored until they are needed by the Gardai.

7.7 In respect of DVDs not required to be retained for security, crime detection or other legitimate purposes, the School will ensure its best endeavours are used to safely and properly dispose of the contents of the DVDs after 28 days.

7.8 Applications received from outside bodies (e.g. solicitors) to view or release personal data stored on DVDs and held by the School will be referred to the Principal. In these circumstances a copy of the relevant DVD will normally be made available for viewing or released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: €6.35 for subject access requests; a sum not exceeding the cost of materials in other cases.

8. Breaches of the Policy (including breaches of security)

8.1 Any breach of the Policy by the School staff or any other person with responsibility under the Policy will be initially investigated by the Principal, in order for him/her to take the appropriate disciplinary action.

8.2 Any serious breach of the Policy will be immediately investigated and an independent investigation will be carried out by nominees of the Principal to make recommendations on how to remedy the breach.

9. Assessment of the System

9.1 Performance monitoring, including random operating checks, will routinely be carried out by the Administrator.

10. Complaints

10.1 Any complaints about the School's CCTV system should be addressed to the Principal.

10.2 Complaints will be investigated in accordance with paragraphs 8.1 and 8.2 of the Policy.

10.3 Any person who might be deemed a Data Subject in relation to the System shall be at liberty to make a complaint directly to the office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois.

11 Access by the Data Subject

11.1 The Acts provide Data Subjects (individuals to whom "personal data" relate) with a right of access to personal data held about themselves (including images recorded by the System and stored on DVDs), under the terms of the Acts.

11.2 Requests by Data Subjects for such access should be made in writing to the Principal.

11.3 The form of access granted may consist of facilities being offered at the School premises to view the relevant personal data or the release of a copy DVD storing the relevant personal data.

12. Public information

Copies of the Policy will be available to the public from the School Office and the Principal.

Summary of Key Points

- The CCTV system is owned and operated by the school.
- The Control cabinet will be secured at all times.
- Recording DVDs will be used properly and in accordance with the Acts and indexed, stored and destroyed within a reasonable period when it is no longer reasonably necessary to retain such data.
- DVDs may only be viewed by Authorised School Officers, and the Gardai.
- DVDs required as evidence will be properly maintained and preserved and witnessed and packaged before copies are released to the Gardai.
- DVDs will not be made available to the media or third parties generally for commercial or entertainment use.
- DVDs will be disposed of securely.
- Any breaches of the Policy will be investigated by the Principal. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and remedies will be reported to the Principal.