



CCTV Policy

Our Lady of Hope School

Armagh Road Crumlin Dublin 12 D12 V6RK

Rolla: 20555K
RCN: 202206506

Introduction

Closed Circuit Television Systems (CCTVS) are installed in Our Lady of Hope School, Armagh Road, Crumlin, Dublin 12 D12 V6RK.

Purpose of the Policy

The purpose of this policy is to regulate the use of Closed Circuit Television (CCTV) and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of the Board of Management of Our Lady of Hope School.

CCTV systems are installed internally and externally for the purpose of enhancing the 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 environs of the premises during both the daylight and night hours each day.

CCTV surveillance at Our Lady of Hope School is used for the following purposes:

1. to secure and protect the school's premises and assets;
2. to deter crime and anti-social behaviour;
3. to provide a safe environment for all staff, students and visitors; and
4. for verification purposes particularly in circumstances where there is a dispute as to facts and where the recordings may be capable of resolving that dispute.

Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

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 providing a sense of security to its employees, students and visitors to its premises.

Our Lady of Hope School owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises 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 in Our Lady of Hope School by integrating the best practices governing the public and private surveillance of its premises

- The primary aim of the CCTV system in Our Lady of Hope School is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated 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.
- Information obtained through the CCTV system 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 school, including the provisions set down in equality and other educational and related legislation.
- This policy prohibits monitoring based on the characteristics and 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 Our Lady of Hope School is limited to areas that do not violate the individual's reasonable expectation to privacy as defined by law.
- The CCTV system in Our Lady of Hope School will **not** be used:
 - to monitor employee performance
 - to monitor pupil behaviour
 - to monitor normal teacher classroom activity in school
- All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Board of Management of Our Lady of Hope School.

Location of Cameras

CCTV cameras are located internally and externally on the school premises. The Board of Management of Our Lady of Hope School has endeavoured to select locations for the installation of CCTV cameras which are 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 Our Lady of Hope School may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, receiving areas for goods/services
- **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:** Parking areas, Main entrance/exit gates, traffic control
- **Criminal Investigations** (carried out by An Garda Síochána): robbery, burglary and theft surveillance

Covert Surveillance

The Board of Management of Our Lady of Hope School will not engage in covert surveillance. Where An Garda Síochána requests to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by An Garda Síochána will be requested in writing and the school will seek Data Protection Commissioner and/or legal advice.

Notification – Signage

Adequate signage is placed at each location in which a CCTV camera is sited to indicate that CCTV is in operation and a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. (*see below*)



WARNING CCTV cameras in operation

Images are being recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, for the safety of staff and students and for the protection of Our Lady of Hope School and its property. This system will be in operation 24 hours a day, every day.

These images may be passed to An Garda Síochána.

This system is controlled by the Board of Management of Our Lady of Hope School and operated by **EMPS. For further information contact: 01 4562279**

Storage and Retention

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts 1998 to 2018.

The **Data Controller** in respect of images recorded and stored by the CCTV system in Our Lady of Hope School is the Principal on behalf of the Board of Management.

The recordings/images captured by the CCTV system will be retained for a maximum of **28 days** except where the recordings/images capture issues (such as criminal behaviour or a risk to health and safety) and the CCTV recordings/images are retained to investigate that issue(s). In such a situation, the retained data will be logged and destroyed once the purpose for which it was retained has passed.

The recorded footage and the monitoring equipment is securely stored in the Office. The Office is locked when unoccupied and unauthorised access to this office is not permitted.

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 purpose outlined in this policy.

An access log will be maintained by the Principal, stating who accessed the recordings/images, on what dates and times and for what purposes.

Access

In relevant circumstances, CCTV footage may be accessed:

1. By An Garda Síochána where Our Lady of Hope School (or its agents) are required by law to make a report regarding the commission of a suspected crime
2. 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 Our Lady of Hope School property
3. By State Agencies such as Department of Social Protection, Revenue, HSE, etc.
4. To assist the Principal in establishing facts in cases of unacceptable behaviour
5. To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Our Lady of Hope School
6. To individuals (or their legal representatives) subject to a court order
7. To the school's insurance company where the insurance company requires the same in order to pursue a claim for damage to the insured property
8. EMPS Security Company for service/repair and to pixelate images

An Garda Síochána

Access requests by An Garda Síochána shall be processed where such processing is necessary and proportionate for preventing, detecting, investigating or prosecuting criminal offences. Information will only be released when authorised by the Principal following consultation with the Chairperson of the Board of Management. Verbal requests are sufficient to allow for the viewing of the footage.

However, if An Garda Síochána requests CCTV images for a specific investigation, it must:

- Be set out in writing on An Garda Síochána headed stationery;
- State that An Garda Síochána is investigating a criminal matter;
- Be signed by a Garda of Inspector rank or higher;
- Set out the details (date(s), time(s) duration and location) of the CCTV recording required; and
- Cite the legal basis for the request and the legal basis for the transfer of the CCTV footage to An Garda Síochána

On receipt of such a request, the school will seek legal advice to ensure that furnishing a copy of the recording or allowing the Gardaí to view it complies with Section 8(b) of the Data Protection Acts. In certain extraordinary circumstances a warrant may be required.

A log is maintained of all requests by An Garda Síochána.

State Agencies

If a state agency such as the Department of Social Protection, Revenue, HSE, etc. requests information/data from the school, the school will need to satisfy itself that the state agency has a legal basis for requesting the school provide such data, and that the school is obliged to disclose the requested information on the basis of that legal requirement. The school will seek Data Protection Commissioner and/or legal advice in such situations.

Data Access Request

Upon written request, individuals whose image has been recorded has a right to request and be given a copy of the information recorded which relates to them, provided 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/pixelated 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 Secretary of the Board of Management. The school must respond **within 1 month**.

Access requests can be made to the following: Secretary, Board of Management, Our Lady of Hope School, Armagh Road, Crumlin, Dublin 12. **Eircode** D12 V6RK. The access request must be accompanied with a copy of photographic identification e.g., passport or drivers licence.

A person should provide all the necessary information to assist Our Lady of Hope School in locating the CCTV recorded data, such as the date(s), time(s) 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.

In giving a person a copy of their data, the school may provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured/pixelated before the data is released.

Responsibilities

The Principal will:

1. Act as Data Controller on behalf of the Board of Management.
2. Ensure that the use of the CCTV systems is implemented in accordance with the policy set down by the Board of Management.
3. Oversee and co-ordinate the use of CCTV monitoring systems for safety and security purposes within Our Lady of Hope School.
4. Ensure that all existing CCTV monitoring systems are compliant with this policy.
5. Be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
6. Maintain a record of the release of any material recorded or stored on the CCTV system.
7. Ensure that monitoring recorded tapes are not duplicated for release.
8. Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
9. Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the school.
10. Advise the Board of Management to ensure that adequate signage, at appropriate and prominent locations, is displayed.
11. Ensure that external cameras are non-intrusive in terms of their positions and comply with the principle of "Reasonable Expectation of Privacy"
12. Ensure that recordings/images are stored in a secure place with access by authorised personnel only.

13. Ensure that recordings/images are retained not longer than **28 days** 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.
14. 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.
15. Ensure that when An Garda Síochána requests to set up mobile video equipment for criminal investigations, the Data Protection Commissioner and/or legal advice has been obtained and such activities have the approval of the Chairperson of the Board of Management.
16. Ensure that staff are familiar with the policy and that any revisions are publically shared via the school website.

Security Company

The school CCTV system is controlled by the Board of Management and operated by EMPS, a security company contracted by the Board of Management.

The school has a written *Third Party Service Agreement* with EMPS Security Company 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 *Third Party Service Agreement* also states that the security company will give the school all reasonable assistance to deal with any subject access request made under Data Protection legislation which may be received by the school within the statutory time-frame i.e. one month.

Communication, Ratification and Review

This policy is ratified at a meeting of the Board of Management on 5th March 2024. A copy of this policy is circulated to the school community and available on the school website. The implementation of the policy will be monitored by the Principal of the school.

The policy will be reviewed every two years and amended as necessary or earlier if required by legislation.

Signed:



Chairperson, Board of Management

Date: 05.03.2024

Next Review Date: March 2026