CCTV Policy for Glenamaddy Community School

1. POLICY STATEMENT

Closed Circuit Television (CCTV) is an increasing feature of our everyday lives. It can, and is, used for a variety of reasons and has been regulated in accordance with the Data Protection Acts 1988 – 2018.

This policy is designed to inform staff, students and the public about the safeguards in place with regard to the operation of and access to the CCTV systems and the resultant images in the school.

2. PURPOSE FOR PROCESSING

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, students and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);supporting the Gardaí in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders;
- ensuring that the school rules are respected so that the school can be properly managed;
- assisting the school in its compliance with legal obligations and its duty of care to staff and students; and
- assisting the school in disciplinary matters.

3. LEGAL BASIS FOR PROCESSING PERSONAL DATA

CCTV images are personal data for the purposes of Data Protection legislation. The processing of CCTV is carried out in the legitimate interest of the school.

4. SCOPE

This Policy applies to the premises and grounds of [NAME OF SCHOOL]

5. LEGISLATION/OTHER RELATED POLICIES

Data Protection Acts 1988-2018
School Data Protection Policy
School Data Subject Access Request Procedure contained in Appendix 4 of the School Data Protection Policy.

6. ROLES AND RESPONSIBILITIES

It is the responsibility of the Board of Management to monitor this policy and ensure it is implemented in the school.

The Board of Management will delegate the responsibility to the school principal as the day to day responsible person for the management of CCTV equipment and the availability of recordings/images.

All staff and students must adhere to the relevant parts of this policy.

Data Subject Access Requests for access to recordings/images will be dealt with by the school principal. The school principal cannot release/access CCTV footage except on the expressed request of a data subject (or a parent/guardian where the data subject is under 18) captured in the footage. See section 9 of this policy.

7. LOCATION OF CAMERAS AND SIGNAGE

Cameras are located in such a position that they only monitor those areas intended to be covered by the equipment.

The locations take into account the individuals' right to privacy and this right is balanced against the purpose of the recording when deciding on the location of cameras, for example in the consideration of placing cameras in such places as bathrooms or changing rooms.

Signage

CCTV signs are displayed in a prominent place where they are clearly seen by staff, students and the public.

The signs contain the following information:

The purpose for the CCTV

That the Board of Management is the Data Controller

Contact details for the school.

8. QUALITY OF THE IMAGES

It is important that the images produced by the cameras are as clear as possible in order that they are effective for the purpose/s for which they are intended.

All relevant equipment should be maintained on a regular basis to ensure the quality of the images is upheld.

9. RETAINING INFORMATION AND PROCESSING IMAGES

It is important that images are not retained for longer than is considered necessary for the purpose for which they were processed. While images are retained, it is essential that their integrity is maintained, for both evidential purposes and to protect the rights of those individuals captured in the images.

Images should not be retained for longer than 30 days unless they are required for evidential purposes in legal proceedings. Under these circumstances, the information should be retained securely and clearly marked as to why it is being retained for a period exceeding 30 days.

10. ACCESS TO THE IMAGES

It is important that access to, and the disclosure of, images to third parties is strictly controlled and documented. This is to ensure that the rights of the individual shown in the images are maintained and that the chain of evidence remains intact should the images be required for evidential purposes.

Data Subject Access Requests

Under Data Protection legislation, an individual has the right to view personal information held about them by the school. The school principal will arrange for the copying of or on site viewing of the recording, to satisfy the request. The images of identifiable 3rd party individuals also captured in the CCTV footage may have to be redacted to protect the data protection rights of those individuals. The School Data Subject Access Request Procedure shall apply.

In addition, the following should be logged:

Details of the image disclosed i.e. the date, time and location of the image the reason for the disclosure;

Whether any images were disguised/blurred to prevent identification of individuals other than the data subject.

If it is not possible to disguise images, an external company may be called in to facilitate this. This will need to be logged.

Requests will not be complied with if insufficient details are supplied relating to the date and time of the recording. A letter must be sent to the data subject advising them of this.

If the data subject wishes to view the images on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant individuals present.

Garda Requests:

In line with the Data Protection Acts 1988- 2018, An Garda Siochana are entitled to view personal information about individuals if it is for the following purposes:

For the prevention or detection of crime;

The apprehension or prosecution of offenders;

Required urgently to prevent injury or other damage to the health of a person or serious loss of or damage to property;

Required by or under any enactment or by a rule of law or order of a court.

Requests must be made on the official Garda Data Protection form and passed to the school principal.

Should information be required to be retained for evidential purposes, procedures detailed in Section 8.2 should be followed.

11. REVISION AND AUDIT

This policy will be reviewed by ACCS regularly and always following changes in relevant legislation.

The revised or amended policy will be approved by the Board of Management.