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MOATE COMMUNITY SCHOOL

POLICY ON CCTV SYSTEMS AND ASSOCIATED DATA MANAGEMENT

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

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.

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 and surrounding environs of premises under the remit of the Board of Management of Moate Community School.

Purpose of CCTV Systems:

CCTV is installed internally and externally in premises for the purpose of enhancing security of the building and its associated equipment as well as creating mindfulness among the occupants, at any one time, that a surveillance security system is in operation to deter, detect and prevent bullying, for crime prevention, prevention of anti-social behaviour, the protection of personal and school property and for the safety of staff and students.

It has also been put in place 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 the school and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

Legislation/Other Related Policies:

1. Data Protection Acts 1988-2018
2. School Data Protection Policy

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 as providing a sense of security to its employees, students and invitees to its premises. The school owes a duty of care under the provision of Health, Safety and Welfare legislation and utilizes 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 at Moate Community School, by integrating the best practices governing the surveillance of its premises.

- Monitoring for security purposes will be conducted in a professional, ethical and legal manner.
- Diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.
- Information obtained through video monitoring will only be released when authorized by the Principal, following consultation with the Chairperson of the Board of Management.

Moate Community School has endeavoured to select locations for the installation of cameras which are least intrusive to protect the privacy of individuals. Therefore, 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 non-discrimination Policy, Bullying and Harassment in the Workplace Policy, Sexual Harassment Policy and other relevant policies including the provision set down in Equality and other Education related legislation.

For the avoidance of any doubt, CCTV recording/monitoring of an individual based on any of the following is prohibited in this policy: age, civil status, disability, family status, gender, member of Travelling Community, race, religion, sexual orientation, national origin etc.

Video monitoring of public areas, for security purposes, within the school, is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

This policy provides full information on the location of all internal and external CCTV cameras and outlines guidelines for their use. Data from CCTV systems will be accessed and used in accordance with Data Protection Regulations.

Cameras are located in the following areas:

Main entrances	Staff carparks	Reception	School gate
Car Park (Astro)	Back yards	Gym	Computer rooms
Canteen	Choir room	Bag rack areas	Astro Pitch
External Walkways	Locker areas	Front of St. Josephs & Prefab area	
Stairs in Josephs and Technology building		Corridors through the school	

Signs are displayed in prominent places where they can be seen clearly by staff students and the public. The signage includes 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, vandalism and anti-social behaviour
- 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.
- To provide a sense of security and safety
- for the verification and dispute resolution purposes
- for litigation purposes

Staff, students and parents/guardians are 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 camera is in accordance with the Data Protection Acts

Data Protection:

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts. 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 personal data recorded and stored by the CCTV system is only available to the data controller and will be used only for the purposes outlined on the signage. The CCTV system is not used to monitor staff performance or conduct.

Individuals whose images are recorded and stored by the CCTV system 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 will be retained for a maximum of 28 days. Thereafter, it is deleted automatically. The recorded footage and the monitoring equipment is securely stored in the Principal's office. Unauthorized access to that office is not permitted at any time. The office is locked when not occupied by the Principal.

Access to 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. School Data access will apply.

In addition, the following should be logged:

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



2. Whether any images were disguised/blurred to prevent identification of individuals other than the data subject.
3. If it is not possible to disguise images, an external company may be called in to facilitate this. This will be logged.
4. Requests will not be complied with if insufficient details are supplied relating to the date and time of the recording. The data subject will be informed of this.
5. If the data subject wishes to view the image on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant individuals present.

An Garda Siochana

The following procedures are followed in the event that An Garda Siochana seeks to view or take a copy of CCTV footage from the School's CCTV systems:

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:

1. For the prevention of detection of a crime.
2. The apprehension or prosecution of offenders.
3. Required urgently to prevent injury or other damage to the health of a person or serious loss of or damage to property.
4. 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 Principal.

Should information be required to be retained for evidential purposes, Garda procedures apply.

Responsibilities:

The Principal will:

- Ensure that the use of CCTV system is implemented in accordance with the policy 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 existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring at the school 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 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.
- Give consideration to and refer to the Board of Management 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.
- 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 Board of Management.
- 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.

Ratification/Review Procedure:

This policy will be ratified/ reviewed regularly and always following changes in relevant legislation The revised or amended policy will be approved by the Board of Management.

Date: _____

Chairperson of the BOM: _____



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WARNING CCTV CAMERAS IN OPERATION 24/7

CCTV is operated in accordance with the Data Protection Acts 1988 - 2018 for the purposes of

- **Crime prevention**
- **To deter, detect and prevent bullying**
- **The protection of personal and school property**
- **The prevention of anti-social behaviour**
- **The safety of our staff and students**
- **To enable the school to discharge its duty of care**
- **To ensure compliance with the Code of Behaviour**

This system will be operated 24 – hours a day, every day.

These images may be passed to An Garda Síochána in certain circumstances.

This system is controlled by Senior Management at Moate Community School

The Data Controller is the Board of Management Moate Community School. You may contact the Data Controller on [0906481350/info@moatecs.com]