



Ashbourne Community School

CCTV Policy

INTRODUCTION

Closed Circuit Television System (CCTV) is installed in Ashbourne Community School under the remit of the Board of Management and is operated in compliance with the Data Protection Acts 1998 and 2003

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 both the internal and external environs of the premises under the remit of Ashbourne Community School.

All cameras are under the control of the Board of Management of Ashbourne Community School.

THE PURPOSE OF CCTV SYSTEM/Rationale

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security and health and safety of the building and its associated equipment as well as creating a mindfulness among the occupants (staff, students and visitors), 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. Cameras are in place ensuring compliance with the school Code of Behaviour to enable the school to discharge its duty of care.

They are also used to prevent/detect bullying and to reduce the incidence of crime and anti-social behaviour. They would support the Gardai in a bid to deter and detect crime and to assist them in identifying, apprehending and prosecuting offenders.

While our CCTV systems are not to be used to monitor normal teacher/student classroom activity, there are teaching areas where CCTV is in operation (e.g., the GP and Mezz area). In these areas, the teachers who use the area will be informed that the cameras are in operation and that they are not being used to monitor teaching and learning.

SCOPE OF POLICY

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 of *Ashbourne Community School* 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 invitees to its premises. It 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 of the school community by integrating the best practices governing the public and private surveillance of its premises.

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 e.g., CCTV will not be used for monitoring employee performance.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including:

- Dignity at Work Policy,

- Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment
- Other relevant policies i.e., Code of Behaviour, Health & Safety, Anti Bullying Policy, Data Protection Policy, ICT policy and Substance Use Policy, 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., race, gender, sexual orientation, national origin, disability etc. Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy. The Principal will periodically provide written material describing the purpose and location of CCTV monitoring and guidelines for its use. The location of outdoor CCTV cameras will also be indicated to the Board. Data from CCTV system will be accessed and used in accordance with Data Protection Regulations.

LOCATION OF CAMERAS

Cameras are located in the following areas:

Camera Number:	Position / Location:
D1	Caretakers Office
D2	Staff Toilets Red Area
D3	Red Area Entrance
D4	Red Area 3
D5	Red Area 4
D6	Red Area – Guidance Area
D7	Red Area 8
D8	Red Area 12 Social Area
D9	Red Area 9 Social Area
D10	Main Entrance Lobby
D11	SNA Corridor White Area
D12	White Area 5
D13	White Area 13
D14	White Area 10
D15	Blue Area 1 Social Area
D16	Blue Area 4 Social Area
D17	Yellow Area 1 Social Area
D18	Yellow Area 4 Social Area
D19	GP Hall
D20	White Area 18
D21	White Area Plant Room
D22	Art Corridor Entrance (external)
D23	Bike Yard Gates
D24	Main Entrance
D25	Alleyway Front
D26	Rear Gate
D27	Alleyway Back
D28	Yellow Area Entrance (external)

D29	Front Carpark 1
D30	Boiler House Red Area Entrance
D31	Rear Cabins
D32	Red Area Entrance (external)
D33	Yellow Area 4 Corridor
D34	Bike Yard Alleyway
D35	Rear Footpath
D36	Bike Yard Stores
D37	Front Carpark 2
D38	Tent Area
D39	White Area 22
D40	Memorial Garden Gate
D41	Outdoor Courts
D42	Memorial Garden
D43	Mezz 1
D44	Dome
D45	Dome Entrance
D46	Gym Floor 1
D47	Sports Hall Room 1
D48	Sports Hall Office
D49	Sports Hall Front Door
D50	Sports Hall Front Stairwell
D51	Sports Hall Bike Rack
D52	Sports Hall External yellow area entrance
D53	Sports Hall External music cabin
D54	Sports Hall Rear Stairwell
D55	Gym Floor 2
D56	Sports Hall Rear External
D57	Mezz 2

SIGNAGE

Adequate signage is placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage is also displayed at the two main entrances to the building.

Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location. The wording on each sign is as follows:

Warning: CCTV in operation Images are being monitored and recorded for the purposes of crime prevention, the prevention of anti-social behaviour, for the safety of our staff and students and for the protection of school property. The 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 c/o Ashbourne CS. Phone 01-8353066

NOTIFICATION

The Principal will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the school. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use.

The location of CCTV cameras will also be indicated to the Board of Management.

RESPONSIBILITIES

The Principal will:

- Ensure that the use of CCTV systems 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 Ashbourne Community School is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g., an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Provide a list of CCTV cameras and the associated monitoring equipment and capabilities of such equipment, located in the school to the Board of Management.
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. *NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by An Garda Síochána].*
- Consider and refer to the Board of Management both students and staff feedback/complaints 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 of Management 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 neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy".
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Chairperson of the Board of Management.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

COVERT SURVEILLANCE

Ashbourne Community 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 legal advice.

The Principal will ensure that where An Garda Síochána request to set up mobile video equipment for criminal investigations, (covert or otherwise) legal advice has been obtained and such activities have the approval of the Chairperson of the Board of Management.

ACCESS STORAGE & RETENTION

The images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Supervising the access and maintenance of the CCTV System is the responsibility of the Principal. The Principal may delegate the administration of the CCTV System to other staff members. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Gardai, the Deputy Principal, the relevant Year Head, other members of the teaching and non-teaching staff, representatives of the Department of Education and Skills, representatives of the HSE and/or the parent of a recorded student). When CCTV recordings are being viewed, access will be limited to authorised individuals on a **need-to-know** basis.

In relevant circumstances, CCTV footage may be accessed:

- By An Garda Síochána where Ashbourne Community School (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- 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 Ashbourne Community School property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Ashbourne Community School, or
- To individuals (or their legal representatives) subject to a court order.
- To the State's Claims Agency where the SCA requires same in order to pursue a claim for damage done to the insured property.

Requests by An Garda Síochána: Information obtained through video monitoring will only be released when authorised by the Principal following consultation with the Chairperson of the Board of Management and following legal advice. If An Garda Síochána request CCTV images for a specific investigation, An Garda Síochána may require a warrant and accordingly any such request made by An Garda Síochána should be made in writing on Garda headed paper.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always 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 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 Principal. The school may charge up to €6.35 for responding to such a request and must respond **within 40 days**.

Access requests can be made to the following: The Principal, Ashbourne Community School.

A person should provide all the necessary information to assist Ashbourne Community School in locating the CCTV

recorded data, such as the date, time 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 before the data is released.

IMPLEMENTATION & REVIEW

The policy will be reviewed and evaluated on an ongoing basis.

On-going review and evaluation will take cognisance of changing information or guidelines (e.g., from the Data Protection Commissioner, An Garda Síochána, Department of Education and Skills, Audit units (internal and external to the school) ACCS, legislation and feedback from parents/guardians, students, staff and others.

The date from which the policy will apply is the date of adoption by the Board of Management.

This policy has been ratified by the Board of Management of Ashbourne Community School at its meeting on 17th October, 2022 (Meeting Nr. 273)

**Ciarán Flynn, Chairperson,
Board of Management
Ashbourne Community School**

Date: 17th October, 2022.

APPENDIX 1

DEFINITIONS:

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on videotape or DVD or other digital recording mechanism.

The Data Protection Acts – The Data Protection Acts 1988 and 2003 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All school staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Data Protection Acts.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processor - a person who processes personal information on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.