



St. Caimin's Community School

Closed-circuit Television (CCTV) Policy

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Introduction

In St. Caimin’s Community School we foster a sense of community that gives practical effect to the values of our mission statement:

Every person is valued equally in accordance with our Christian Tradition at St. Caimin's School. Each person within the school community can enjoy developing to the fullest, while feeling cared for and safe. Our educational structures are ordered, based on tolerance, fairness and respect, while sensitive to our changing world.

This CCTV Policy has been drafted following consultation with all of the school’s stakeholders. It incorporates the views of parents, students, teachers and other staff and gives practical expression to their values and insights. The stakeholders, in working together, have created a consensus as regards when, where and how CCTV should be used.

Legal Framework

This policy document has been informed by the Data Protection Act 2018 and the EU General Data Protection Regulation 679/2016.

Scope

This policy applies to all personnel in and visitors to St. Caimin’s Community School. Moreover, it relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

This policy prohibits CCTV monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc. Furthermore, CCTV monitoring is limited to uses that do not violate the reasonable expectation to privacy as defined by law. Thus, CCTV cameras will be used to monitor public areas within the building or immediately outside it only.

The personal data recorded and stored by the CCTV system will be used only for the purposes outlined in this policy document. The CCTV system shall not be used to monitor staff performance or conduct.

Rationale

A school needs a CCTV Policy to enable it to operate its CCTV system within the current legal framework.

CCTV are installed internally and externally for the purpose of maintaining security of the building and equipment, and of enhancing the safety and wellbeing of the students, staff, and other persons in the school.

Objectives

The objectives of this CCTV Policy are:

- to enhance the quality of life of the whole school community by improving safety and security within the school
- to assist in the protection and safety of the school property, equipment and materials and that of the school community
- to assist in the prevention, investigation and detection of bullying, harassment and vandalism or other criminal behavior
- to give practical effect to the values of the mission statement

Related policies and documents

This policy document may be read in conjunction with the following:

- Mission Statement
- Anti-bullying policy
- Code of Behaviour for Students
- Substance Abuse Policy
- Safety Statement
- Dignity at Work Charter
- Data Protection Policy

Data controller

The Data Controller in respect of images recorded and stored by the CCTV system in the School is the Board of Management.

Fair obtaining

The fair obtaining principles inherent in the Data Protection Acts 2018 require that those people whose images may be captured on camera are so informed. Accordingly, signs giving effect to this are placed at the school's entrance and reception. These signs state that CCTV is in operation. In addition, signage is placed adjacent to each camera stating its specific purpose (see Appendix 1).

Moreover, this policy should also be considered as notice to the school community of the possibility of their image being captured.

Location of cameras

The CCTV network comprises thirty two cameras. Thirty of these are located in circulation areas, while one each are placed in the gear store and diner respectively.

Data protection, storage and retention

The data captured from the cameras is stored as electronic data in the Deputy Principal's office. Typically, this data will be retained for thirty days. Thereafter, it will be deleted automatically. However, data may be retained for longer periods where in the opinion of the data controller the events captured may give rise to court proceedings.

Access to the data is restricted to authorised personnel. Furthermore, to prevent unauthorised access to the data the storage devices are password protected. Moreover, the office mentioned above is locked when not occupied.

Providing CCTV images to An Garda Síochána

If the Gardaí want CCTV images for a specific investigation, it is up to the data controller to satisfy himself that there is a genuine investigation underway. For practical purposes, a phone call to the requesting Garda's station may be sufficient, provided that you speak to a member in the District Office, the station sergeant or a higher ranking officer, as all may be assumed to be acting with the authority of a District/Divisional officer in confirming that an investigation is authorised.

Access requests

Any person aged eighteen years or over, whose image has been recorded, has a right to be given a copy of the information recorded. To exercise that right, a person must make an application in writing to the data controller. If the person is under eighteen years the parent or guardian may make an application. The costs associated with any application will be borne by the applicant and all such requests must be, insofar as is practicable, responded to within 30 days.

Practically, a person should provide necessary information to a data controller, 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.

In giving a person a copy of his/her data, the data controller may provide a still/series of still pictures, a tape or a disk with relevant images. However, other people's images should be obscured before the data are released.

Maintenance of the CCTV system

The company engaged to maintain the system are subject the terms of the Data Protection Acts 2018 as 'data processors'. Accordingly, they operate under the instruction of the data controller. This company will be given a copy of this CCTV policy thus giving them an awareness of their obligations insofar as it applies to data protection. They are also subject to the terms of a Data Processor Agreement. For more information about the Data Processor please contact us on the detail below.

Review

This policy will be reviewed by the Board of Management from time to time.

Contact Us

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Appendix 1

CCTV in operation

This C.C.T.V. camera is operated in accordance with the Data Protection Acts 1988 and 2003.

The purpose of locating this camera here is:

- * *to deter/detect bullying*
- * *to deter/detect crime, theft and vandalism*
- * *to ensure compliance with the Code of Behaviour*
- * *as an aid to security*
- * *for Health & Safety purposes*
- * *to enable the school to discharge its duty of care.*

Data Controller: *The Principal on behalf of the B.O.M.*