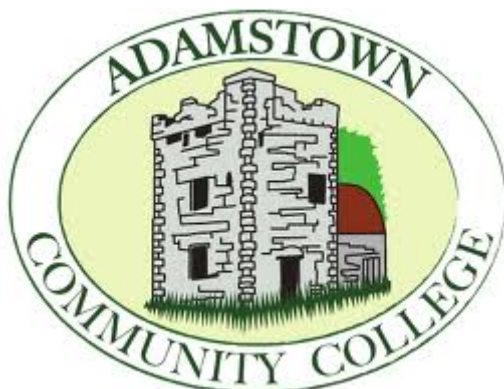


Adamstown Community College



CCTV Policy

INTRODUCTION

Closed Circuit Television Systems (CCTVS) are installed and operate in Adamstown Community College. CCTV systems were introduced in consultation with staff, the board of management and the parents association. Systems in operation will be reviewed regularly in consultation with staff, the board of management and the parents association.

1. 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 Adamstown Community College and Dublin and Dun Laoghaire ETB (DDLETB)”

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing 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 Adamstown Community College is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying and protecting the welfare and safety of students;
- 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; and
- ensuring that the school rules are respected so that the school can be properly managed.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Adamstown Community College and Dublin and Dun Laoghaire ETB will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

3. GENERAL PRINCIPLES

Adamstown Community College and DDLETB operating 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. Adamstown Community College and DDLETB 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 practises 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.

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 and/or the CEO in the case of ETB schools. Any requests for CCTV recordings/images from An Garda Síochána will be fully recorded and legal advice will be sought if any such request is made. (See “Access” below). If a law enforcement authority, such as An Garda Síochána, is seeking a recording for a specific investigation, An Garda Síochána may require a warrant or a section 8 request as per the data protection act. Accordingly any such request made by An Garda Síochána should be requested in writing and the school/ETB will immediately seek legal advice.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school/ETB, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints

of Bullying & Harassment and Sexual Harassment and other relevant policies, 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/ETB premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of Adamstown Community College or DDLETB or a student attending one of its schools/centres.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by Adamstown Community College. Recognisable images captured by CCTV systems are “[personal data](#)” They are therefore subject to the provisions of the [Data Protection Acts](#) 1988 and 2003.

4. RATIONALE FOR USE OF CCTV

Section 2(1) (c) (iii) of the Data Protection Acts requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that Adamstown Community College needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the board of management. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

In other areas of the school where CCTV has been installed, e.g. hallways, stairwells, locker areas and bathrooms, the Principal has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues.

5. LOCATION OF CAMERAS

The location of cameras is a key consideration. Adamstown Community College has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras are placed so as to record

incidents of vandalism and anti-social behaviour in student bathrooms and are positioned only on communal areas (sinks and hand dryers).

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 Adamstown Community College may include the following:

- **Protection of school buildings and property:** The building perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services, communal areas in student bathrooms (to prevent vandalism and anti-social behaviour)
- **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

5.1 Additional Cameras

In addition to the cameras in Adamstown Community College. Adamstown Community College also have access to cameras operated in the South Dublin County Council (SDCC) shared facility, Adamstown Youth and Community Center. Adamstown Community College operates in the Community Centre from the hours of 8 am to 5pm Monday to Friday throughout the calendar academic school year. During these times CCTV is used to gather footage of the use of the facilities or cases of anti-social behaviour , vandalism or damage to any of the equipment in this building.

SDCC are the data controllers and store the footage on a server on their side of the building however there are shared screens in the teacher's office within the Centre.

In cases where the footage needs to be viewed, one of the school management team can view the footage in the presence of the manager of the SDCC building. This is in agreement with both Boards.

The school may also decide to refer an incident to an Garda Síochána for investigation allowing for AGS to review any relevant CCTV footage.

This agreement is also outlined in the Adamstown Youth and Community centre CCTV policy.

6. COVERT SURVEILLANCE

Adamstown Community College 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.

7. NOTIFICATION – SIGNAGE

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 and also to the CEO. Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to Adamstown Community College property. 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.



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of antisocial behaviour, the prevention of bullying, for the

safety of our staff and students and for the protection of Adamstown Community College 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 scheme is controlled by Adamstown Community College and DDLETB For more information contact01 6540348

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area
- at or close to each internal camera

8. 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.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. 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 another staff member. 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 Gardaí, the Deputy Principal, the relevant Year Head, other members of the 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.

Images and /or video written to DVDs will be stored in a secure environment with a log of access to discs kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

9. ACCESS

DVDs storing the recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to images will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. Principal of school (or in the case of an ETB school/centre to the Head of the Centre and the CEO of the ETB).

In relevant circumstances, CCTV footage may be accessed:

- By An Garda Síochána where Adamstown CC or DDLETB are required by law to make a report regarding the commission of a suspected crime
- 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 Adamstown CC property
- To TUSLA, HSE and/or any other statutory body charged with child protection
- To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Adamstown CC or DDLETB
- To individuals (or their legal representatives) subject to a court order
- To the school's/ETB's insurance company where the insurance company requires same, in order to pursue a claim for damage done to the insured property
- To the Board of Management and/or the board of the ETB (and/or any Section 29 Appeals Committee, and/or Teacher Disciplinary Appeals Panel where relevant) to assist in establishing facts in cases involving unacceptable behaviour, disciplinary and/or competence issues in order to ensure that the school/ETB rules and policies are respected so that the school/ETB can be properly managed

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 (or in the case of ETB schools, following consultation with the CEO of the ETB). 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 and the school/ETB should immediately seek legal advice.

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 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/CEO of the ETB. The school/ETB must respond **within 40 days**.

Access requests can be made to the following: *Dave Anderson, Principal or Catriona Murphy, CEO, DDLETB*

A person should provide all the necessary information to assist Adamstown Community College 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/ETB.

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

10. RESPONSIBILITIES

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Adamstown Community College
- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within Adamstown Community College
- Ensure that the CCTV monitoring at Adamstown CC 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 any material recorded or stored in the system
- Provide a list of the CCTV cameras and the associated monitoring equipment and the capabilities of such equipment, located in Adamstown CC to the ETB 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. *NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by An Garda Síochána].*

- Give consideration to 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
- Cooperate with the Health & Safety Officer of Adamstown CC in reporting on the CCTV system in operation in the school
- Advise the ETB that adequate signage at appropriate and prominent locations is displayed as detailed above
- Ensure that images recorded on 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 or by the CEO on behalf of the ETB.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that where An Garda Síochána request to set up mobile video equipment for criminal investigations, legal advice has been obtained and such activities have the approval of the Chairperson of the Board or the CEO.

11. IMPLEMENTATION & REVIEW

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/ETB) the C&AG (in the case of ETBs), national management bodies, 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. Implementation of the policy will be monitored by the Principal of the school.

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/ETB 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 outsourced work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.

Appendix 2 Privacy Impact Statement

Dublin and Dún Laoghaire Education and Training Board

CCTV Installation – Privacy Impact Statement

Before a school/centre installs a new CCTV system, the following documented privacy impact assessment must be carried out. An ETB which properly conducts such an assessment is less likely to introduce a system that contravenes the provisions of the Data Protection Acts 1988 & 2003. This is an important procedure to adopt as a contravention may result in action being taken against an ETB by the Office of the Data Protection Commissioner, or may expose an ETB to a claim for damages from a student:

What is the school/centre's purpose for using CCTV images? What are the issues/problems it is meant to address? <i>[Write or type your answer here]</i>		
Is the system necessary to address a pressing need, such as staff and student safety or crime prevention?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are the CCTV cameras intended to operate on the outside of the premises only?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is it justified under the circumstances?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is it proportionate to the problem it is designed to deal with?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is it intended that CCTV cameras will operate inside of the building?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are internal CCTV cameras justified under the circumstances?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are internal CCTV cameras proportionate to the problem they are designed to deal with?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
What are the benefits to be gained from its use? <i>[Write or type your answer here]</i>		
Can CCTV systems realistically deliver these benefits? Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you need images of identifiable individuals, or could the system use other images which are not capable of identifying the individual?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Will the system being considered deliver the desired benefits now and remain suitable in the future?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
What future demands may arise for wider use of images and how will they be addressed? <i>[Write or type your answer here]</i>		
Is the ETB the data controller for the entire CCTV system (bearing in mind that some schools under the PPP are managed for operational purposes by management companies, in which case specific legal advice may need to be sought)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Where a management company is in place, are you satisfied that it complies with the Data Protection Acts with regard to the processing of images of staff, students and visitors to your school captured on any CCTV systems under its management?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
What are the views of those who will be under CCTV surveillance?		

<i>[Write or type your answer here]</i>		
What could be done to minimise intrusion for those whose images may be captured, particularly if specific concerns have been expressed? <i>[Write or type your answer here]</i>		
How have staff, students and visitors been assured by the school/ centre that the CCTV system will be used only for the stated purposes? <i>[Write or type your answer here]</i>		
Does the ETB's policy on the use of CCTV make it clear that staff (teaching and non-teaching) will not be monitored for performance or conduct purposes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Have the views of staff & students regarding the location of cameras been taken into account?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Can the location of each internal camera be justified in accordance with the overall purpose for the use of the CCTV system?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Has appropriate signage been erected at the location of each internal camera indicating that recording is taking place and outlining the purpose of such recording?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Who will have access to the system and recordings/images? <i>[Write or type your answer here]</i>		
What security measures are in place to protect the CCTV system and recordings/images? <i>[Write or type your answer here]</i>		
Are those who will have authorised access to the system and recordings/images clear about their responsibilities?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are the camera monitors kept out of view of staff, students and visitors and is access to the camera monitors restricted to a limited number of staff on a 'need to know' basis?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is the room(s) which houses the camera monitors and the CCTV system securely locked when unattended?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Does the school/centre have a procedure in place to ensure that recordings/images are erased or deleted as soon as the retention period (28 days) has expired?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Does the school/centre have a procedure in place for handling requests for access to recordings/images from An Garda Síochána?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Will appropriate notices be in place to ensure that individuals know that they are being monitored?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Does the school have a procedure in place to handle access requests seeking a copy of images recorded by the CCTV system (within the statutory timeframe of forty days)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Has the right of access been communicated to staff, students and visitors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Has the school communicated its policy on the use of CCTV to staff, students and visitors and how has this been done?

[Write or type your answer here]

How are the new students and new staff informed of the school's policy on the use of CCTV?

[Write or type your answer here]

Reference / School / College / Centre / Project:

Signature of Principal:

Date: