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**RATHFARNHAM**



**EDUCATE TOGETHER  
NATIONAL SCHOOL**

## **RETNS POLICY ON THE USE OF CCTV**

### ***Policy No. 1/18***

#### **Introduction:**

A Closed Circuit Television, CCTV, system is in use in RETNS under the remit of the Board of Management, BOM. This policy sets out the purpose of having this system in place and how its use will be managed. This policy was ratified in February 2018 and will be reviewed regularly.

#### **Purpose:**

The purpose of this policy is to regulate the use of CCTV and its associated technology in RETNS. The CCTV system is installed internally and externally on the 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 to deter crime, vandalism and theft, as an aid to the promotion of high-quality health and safety standards, and to the discharge of the school's duty of care within and-or in the external environs of the premises at all times.

**Scope:**

This policy applies to all staff, pupils and visitors to RETNS. It relates directly to the location and use of CCTV, including the monitoring, recording and subsequent use of such recorded material. The use of CCTV 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.

**Policy statement:**

The BOM of RETNS, as the corporate body has a statutory responsibility for the protection of the school's property and equipment as well as providing a sense of security to its employees, pupils and visitors to its premises. RETNS has a duty of care under the provisions of health, safety and welfare legislation and utilises the CCTV system and its associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life in RETNS by integrating the best practices governing the surveillance of its premises.

**1.1 Aim:**

The primary aim of the CCTV system in RETNS is to deter crime and vandalism; to promote high standards with regard to health and safety; and to assist in the protection and safety of school property and its associated equipment and materials.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy.

Information obtained through video monitoring may only be released when authorised by the Principal, following consultation with the Chairperson of the BOM.

**1.2 Use of CCTV:**

CCTV monitoring of public areas, for security purposes, will be conducted in a manner consistent with all existing policies adopted by the BOM, including the provisions set down in equality and other education related legislation. The code of practice regarding video monitoring prohibits monitoring based on the classifications contained in equality and other related legislation, for example, gender, marital status, family status, sexual orientation, religion, age, disability, race or membership of the Traveller community.

Video monitoring of public areas, for security purposes, within RETNS is limited to areas that do not violate the reasonable expectation to privacy as defined by law. Data from the CCTV system will be accessed and used in accordance with data protection regulations.

The CCTV system will not be used to monitor usual teacher/pupil classroom activity in RETNS.

**1.3 Cameras:**

RETNS has endeavoured to select locations for CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras located so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or another person's private property.

Cameras are located in the following areas:

#### Internal

- The Reception/Lobby Area

#### External

- The Main Entrance Area

CCTV video monitoring and recording in public areas may include:

- For the purpose of the protection of school buildings and property, encompassing the building's perimeter, entrances, and exits
- Monitoring of control access systems recording restricted access areas at entrances to buildings and other areas
- Verification of security alarms including alarms, exit door controls and external alarms
- Video patrol of public areas including parking areas, main entrances and exits, and
- Criminal investigations carried out by An Garda Síochána.

#### **1.4 Notification:**

RETNS will not engage in covert surveillance. Signage is erected at the school entrance advising that a CCTV system is in operation in at the school.

Staff, pupils and parents/guardians are informed of the location and purpose of the CCTV system as outlined above. The right to access images captured by CCTV cameras shall be in accordance with the Data Protection Acts of 1998 and 2003, and as per the RETNS Data Protection Policy.

#### **1.5 Data Protection:**

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1998 and 2003. 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 a 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 BOM.

The personal data recorded and stored by the CCTV system will only be available to the data controller and will be used only for the purposes outlined in this policy.

Individuals whose images are recorded and stored by the CCTV system shall 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 shall be retained for a maximum of 28 days. Thereafter it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in the Principal's and the School Secretary's office area. Unauthorised access to those offices is not permitted at any time. The offices are secured by means of the access control system.

The following procedures shall be followed in the event that An Garda Síochána seeks to view or take a copy of CCTV footage from the school's CCTV system:

- The data controller shall be satisfied that an investigation is under way; and
- A request from An Garda Síochána must be made in writing.

All CCTV system and associated equipment are required to be compliant with this policy.

### **Roles/responsibilities:**

The BOM will ensure that a CCTV policy is in place, which is compliant with relevant legislation, to govern the use of CCTV in the school. The BOM will also ensure this policy is reviewed regularly.

The Principal will co-ordinate the implementation of this policy and ensure members of the school community are familiar with it. The Principal may delegate the administration of the CCTV system to another staff member in addition, the Principal will:

- Act as the data controller on behalf of the BOM
- Ensure that the use of the CCTV system is used in accordance with this policy as set down by the BOM
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school
- Ensure that all CCTV monitoring systems are compliant with this policy
- Be responsible for the release of any information or material in compliance with this policy
- Maintain a record of the release of any material recorded or stored on this system
- Provide a list of the CCTV cameras, their locations and the associated monitoring equipment and the capabilities of such equipment to the BOM
- If required, approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events
- Ensure that all areas being monitored are not in breach of a reasonable expectation of the privacy of individuals within the school
- Advise the BOM on ensuring that adequate signage, at appropriate and prominent locations, is displayed
- Ensure that external cameras are not intrusive in terms of their positions and views of residential housing and comply with the principle of "reasonable expectation of privacy"
- Ensure that recorded material is retained for a period not longer than 28 days and will 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 BOM; and
- Ensure that monitors are stored in a secure place with access by authorised personnel only.

**Related documentation:**

Relevant school policies, whether already in place and being reviewed or being developed, shall be examined with reference to this policy to ensure consistency and to take account of any points arising that may need to be addressed. These policies shall include the RETNS policies on data protection and the school's code of behaviour and on ICT acceptable use. The CCTV policy has been developed with reference to the school's obligations under its Data Protection Policy and related data protection legislation.

**Review:**

This policy was ratified by the BOM on 12 February 2018. It will be reviewed annually and if necessary updated to take account of changing circumstances – for example, any alterations to the CCTV system – or updated guideless on data protection or other legislation or advice or from the Department of Education and Skills.

**Contact details:**

Queries about this policy should be addressed to the Principal in the first instance:

The Principal

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