

Mayfield Community School

CCTV System Draft Policy

1. Introduction

1.1 The purpose of the CCTV System Policy in Mayfield Community School is to regulate the management, operation and use of the closed circuit television (CCTV) system in the school environs.

1.2 The system comprises a number of fixed and PIR cameras located around the school site. The Policy follows Data Protection Commissioner guidelines and is drafted in conformity with the Data Protection Acts 1988-2003.

1.3 The policy is drafted in consultation with all the education partners within the school community and is subject to review every 3 years.

1.4 The System is wholly owned and operated by the School.

2. Objectives of the System

2.1 (a) To protect the school buildings and their assets,

(b) To increase personal safety of staff, pupils and visitors and reduce the fear and incidence of crime,

(c) To support the Gardai in a bid to deter and detect crime,

(d) To assist in identifying, apprehending and prosecuting offenders,

(e) To protect members of the public and private property,

(f) To assist in managing the School,

(g) To assist in relation to matters other than security, namely, the promotion of and compliance with Health and Safety standards and taking appropriate disciplinary measures, where so required.

(h) The System will not be used to monitor staff conduct or performance, except where required to investigate the alleged commission of a crime.

3. Statement of intent

3.1 The School will treat the System and all information, documents and recordings obtained and used there from as data which may be deemed personal data requiring protection under the Acts.

3.2 Cameras will be used to monitor activities within the school circulation areas, student areas, ICT rooms, its car parks and other public areas as an adequate, relevant and proportionate response to the achievement of the objectives identified at paragraph 2.1.

3.3 Maintenance Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property. Where necessary filters will be used

3.4. Unless an immediate response to events is reasonably required, staff must not directly focus cameras singularly at an individual, their property or a specific group of individuals, without an authorisation being obtained using the school's forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

3.5 Materials or knowledge secured as a result of the use of the System will not be used for any commercial purpose. The recorded images shall be stored on DVDs which will only be released to the Gardai or other third parties for use in the investigation of a specific crime and with the

written authority of the Garda Siochana. DVDs containing personal data will never be released to the media or other third parties for any purpose that is not permitted under the Policy without the Data Subject's consent.

3.6 The planning and design of the System has endeavored to ensure that it will give maximum effectiveness and efficiency insofar as is reasonably practicable but it is not possible to guarantee that the System will cover or detect every single incident taking place in the areas of coverage.

3.7 Warning signs, as required by the Code of Practice of the Data Protection Commissioner have been placed at all access routes to areas covered by the school CCTVs to inform all persons who may be deemed Data Subjects, of the operation of the System

4. Operation of the system

4.1 For the purposes of the Data Protection Acts 1988-2003 the Data Controller will be Mayfield Community School. In practice, the System will be managed by the Principal, in accordance with the principles and objectives expressed in the Policy.

4.2 The day-to-day management will be the responsibility of the Caretakers and maintenance staff as approved by the Principal. Other personnel may also be authorised by the Principal to view recorded images for the purposes outlined in this policy..

4.3 The Control Room will only be staffed by the School's authorised security and caretaking staff who shall also adhere to the Policy.

4.4 The System will be operated 24 hours each day, every day of the year, except for periods of breakdown or necessary maintenance.

5. Control Room

5.1 The Caretaker's office is where the system is installed and from where it is controlled. The Caretaker, School Management will check and confirm the efficiency of the System regularly and in particular that the equipment is properly recording and that cameras are functional. The recording equipment is password protected.

5.2 Access to the Control Room will be limited to the authorised people while recorded data is being viewed.

5.3 If out of hours emergency maintenance arises, the caretaking staff must be satisfied of the identity and purpose of contractors before allowing access to the Control Room

5.4 During the working day when the Caretaker's office is not manned it will be kept locked.

5.5 Emergency procedures will be used in appropriate cases to call the Emergency Services.

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6. Monitoring procedures

6.1 Camera surveillance will be maintained at all times.

6.2 Monitors are installed in the following areas and will be used only in accordance with this policy:

(a) Administrator's offices

(b) Cafeteria Area

(c) Corridors and Mall areas

(d) Entrance doors of main school building

(e) ICT Rooms

(f) Car park, School Driveway and other external public areas

7. Video recording procedures

7.1 Recordings are initially made to a hard disk which is located in the Control Room in the Caretakers's office. The equipment is programmed to delete images after 28 days automatically. Data can be recorded on to DVDs for specific purposes in accordance with this policy and with the authorisation of the Principal. Such DVDs will be stored in a locked cabinet.

7.2 In order to maintain and preserve the integrity of the DVDs used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

(i) Each DVD must be identified by a unique mark.

(ii) Before use each DVD must be cleaned of any previous recording.

(iii) The authorised person shall register the date and time of DVD insert, including DVD reference.

(iv) A DVD required for evidential purposes must be sealed, witnessed, signed by the Authorised person, dated and stored in a separate and secure location. If a DVD is not copied for the Gardai before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the Authorised person, dated and returned to the secure DVD store.

(v) If the DVD is archived the reference must be noted.

7.3 DVDs may be viewed by the Gardai for the prevention and detection of crime

7.4 A record will be maintained of the release or viewing of DVDs to the Gardai or other authorised persons. A register will be maintained for this purpose.

7.5 Should a DVD be required as evidence, a copy may be released to the Gardai under the procedures described in paragraph 7.2 (iv) of the Policy. DVDs will only be released to the Gardai on the clear understanding that the recording remains the property of the School, and both the DVD and information contained on it are to be treated in accordance with this code. The School also retains the right to refuse permission for the Gardai to pass to any other person the DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence DVD store, complete in its sealed bag.

7.6 The Gardai may require the school to retain the stored DVDs for possible use as evidence in the future. Such DVDs will be properly indexed and properly and securely stored until they are needed by the Gardai.

7.7 In respect of DVDs not required to be retained for security, crime detection or other legitimate purposes, the School will ensure its best endeavors are used to safely and properly dispose of the contents of the DVDs after 28 days.

7.8 Applications received from outside bodies (e.g. solicitors) to view or release personal data stored on DVDs and held by the School will be referred to the Principal. In these circumstances a copy of the relevant DVD will normally be made available for viewing or released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: €6.35 for subject access requests; a sum not exceeding the cost of materials in other cases.

8. Breaches of the Policy (including breaches of security)

8.1 Any breach of the Policy by the School staff or any other person with responsibility under the Policy will be initially investigated by the Principal, in order for him/her to take the appropriate disciplinary action.

8.2 Any serious breach of the Policy will be immediately investigated and an independent investigation will be carried out by nominees of the Principal to make recommendations on how to remedy the breach.

9. Assessment of the System

9.1 Performance monitoring, including random operating checks, will routinely be carried out by the Caretaker and Maintenance staff.

10. Complaints

10.1 Any complaints about the School's CCTV system should be addressed to the Principal.

10.2 Complaints will be investigated in accordance with paragraphs 8.1 and 8.2 of the Policy.

10.3 Any person who might be deemed a Data Subject in relation to the System shall be at liberty to make a complaint directly to the office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois.

11 Access by the Data Subject

11.1 The Acts provide Data Subjects (individuals to whom "personal data" relate) with a right of access to personal data held about themselves (including images recorded by the System and stored on DVDs), under the terms of the Acts.

11.2 Requests by Data Subjects for such access should be made in writing to the Principal.

11.3 The form of access granted may consist of facilities being offered at the School premises to view the relevant personal data or the release of a copy DVD storing the relevant personal data.

12. Public information

Copies of the Policy will be available to the public from the School Office and the Principal.

Summary of Key Points

- The CCTV system is owned and operated by the school.
- The Control Room will be secure at all times.
- Recording DVDs will be used properly and in accordance with the Acts and indexed, stored and destroyed within a reasonable period when it is no longer reasonably necessary to retain such data.
- DVDs may only be viewed by Authorised School Officers, and the Gardai.
- DVDs required as evidence will be properly maintained and preserved and witnessed and packaged before copies are released to the Gardai.
- DVDs will not be made available to the media or third parties generally for commercial or entertainment use.
- DVDs will be disposed of securely.
- Any breaches of the Policy will be investigated by the Principal. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and remedies will be reported to the Principal.