



CCTV Policy

Closed Circuit Television Systems (CCTVS) are installed on the grounds of Headfort School. Their operation will be reviewed regularly by the Headfort Trust.

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 the Headfort Trust.

CCTV systems are installed (externally) on the premises for the purpose of enhancing the security of the buildings 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 the School is intended for the purposes of:

1. protecting the school buildings and school assets, both during and after school hours;
2. promoting the health and safety of staff, pupils and visitors;
3. preventing bullying;
4. reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
5. supporting the Gardaí in a bid to deter and detect crime;
6. assisting in identifying, apprehending and prosecuting offenders; and
7. ensuring that the school rules are respected so that the school can be properly managed.

Scope

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 the Headfort Trust as charity trustees have a responsibility for the protection of the Trust's property, equipment and other plant as well providing a sense of security to its employees, students and invitees to its premises. The Headfort Trust also 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. CCTV will not be used for monitoring employee performance.



Information obtained through the CCTV system may only be released when authorised by the Headmaster, following consultation with the Chairperson of the Headfort Trust. Any requests for CCTV recordings/images from An Garda Síochána will be fully recorded and advice from the Data Protection Commission/legal advice will be sought if any such request is made.

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

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.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Headfort Trust. Recognisable images captured by CCTV systems are personal data. They are therefore subject to the provisions of the Data Protection Acts 1988 to 2018.

Justification for use of CCTV

Data Protection legislation requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that the Headfort Trust 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 Trust. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorization.

Location of Cameras

The Headfort Trust has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. 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

Covert Surveillance

Headfort Trust will not engage in covert surveillance.

Where An Garda Síochána requests to carry out covert surveillance on the Trust's premises, such covert surveillance may require a court order. Accordingly, any such request made by An Garda Síochána will be in writing and the Trust will seek Data Protection Commission/legal advice



NOTIFICATION – SIGNAGE

The Principal will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the school via the school website. 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.

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 Headfort Trust/ School 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. The signage at the School entrance shall be in the following form or a form as near to it as circumstances permit:

"Warning

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of staff and pupils and for the protection of Headfort Trust 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 system is controlled by the Headfort Trust.

For more information contact the Headmaster on 0469271116."

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area.

Storage & Retention

Data Protection legislation states that data "shall not be kept for longer than is necessary for" the purposes. Accordingly it is our policy to retain CCTV data for no longer than 28 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. . Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headmaster. The Headmaster 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, other members of the teaching staff, representatives of the HSE/Tusla and/or the parent of a recorded pupil. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.



Digital recordings will be stored in a secure encrypted environment in line with Data Protection Acts. Access will be restricted to authorised personnel. A soft copy of the recordings (DVD, USB or otherwise) shall not be made without the express consent of the Board of the Headfort Trust and must be for a specified purpose and compliant with Data Protection legislation.

Access

The DVR recording is held in a secure locked area.

Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. the Headmaster of the school

In relevant circumstances, CCTV footage may be accessed:

1. By An Garda Síochána where Headfort Trust are required by law to make a report regarding the commission of a suspected crime; or
2. 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 Headfort Trust property, or
3. By Tusla and/or by any other statutory body charged with child safeguarding; or
4. To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case the parents/guardians will be informed; or
5. By data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Headfort Trust or
6. By individuals (or their legal representatives) subject to a court order
7. By the school's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.
8. At times the building/site is unoccupied to meet the purposes listed above for having CCTV cameras.



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 Trust. 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 should immediately seek advice from the Data Protection Commission or 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 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 a fee for responding to such a request and must respond within 40 days.

A person should provide all the necessary information to assist Headfort Trust 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.

Responsibilities

The Principal will:

1. Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the Headfort Trust
2. Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Headfort Trust property
3. Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
4. Ensure that the CCTV monitoring at Headfort Trust property is consistent with the highest standards and protections
5. Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy



6. Maintain a record of access (e.g. an access log) to the release of tapes or any material recorded or stored in the system
7. Ensure that monitoring recorded tapes are not duplicated for release
8. Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
9. Give consideration to both students' and staff feedback and/or complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
10. 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
13. 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"
14. Ensure that monitoring tapes/DVDs/digital recordings are stored in a secure place with access by authorized personnel only
15. 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 Board of the Headfort Trust
16. Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
17. Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
18. Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas
19. Ensure that where An Garda Síochána request to set up mobile video equipment for criminal investigations, Data Protection Commission/legal advice has been obtained and such activities have the approval of the Chairperson of the Trust



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Implementation & Reviews

This policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commission, An Garda Síochána, Tusla, Department of Education and Skills, Audit units (internal and external to the school), 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 Headfort Trust. Implementation of the policy will be monitored by the Principal of the school.

Reviewing and evaluating the policy

The policy will be reviewed and evaluated after 2 years. The policy will be revised as necessary in the light of such review and evaluation and within the framework of school planning.

Adopted by the Headfort Trust November 2022.