



**Loreto Secondary School, Wexford.**

## **Closed Circuit TV Policy**

Controller:	Loreto Secondary School, Wexford
Address:	Pembroke Hill, Ballynagee, Wexford
Contact:	Email: <a href="mailto:dpo@loretowexford.com">dpo@loretowexford.com</a> Tel: 053 9146162
Principal:	Billy O'Shea

# CONTENTS

## Contents

1.0 Policy Statement .....	3
2.0 Policy Purpose .....	3
3.0 Policy Scope .....	3
4.0 Legislation .....	3
5.0 Purposes of CCTV .....	3
6.0 Purpose Limitation .....	4
7.0 Roles & Responsibilities .....	4
8.0 Summary Description & Technical Specifications for the CCTV System .....	5
9.0 Location of Cameras .....	5
10.0 Signage .....	6
11.0 Quality of the Images from CCTV .....	6
12.0 Retaining Information & Processing Images .....	6
13.0 Access to the Images .....	6
14.0 Subject Access Requests (SARs) .....	7
15.0 Access Requests from An Garda Síochána .....	7
16.0 Implementation and Reviews .....	8

## 1.0 Policy Statement

1.1 Closed Circuit Television (CCTV) at the premises of Loreto Secondary School, Pembroke Hill, Ballynagee, Wexford is regulated in accordance with the General Data Protection Regulation 2016/679 (GDPR).

## 2.0 Policy Purpose

2.1 The purpose of this policy is to summarise the safeguards in place regarding the operation of and access to the CCTV systems, and the all images captured as a result of the operation of the CCTV. CCTV surveillance at the School 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;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Gardai 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.

## 3.0 Policy Scope

3.1 This policy applies to all staff and third parties involved in the operations of Loreto Secondary School, Wexford CCTV systems. Where classes and activities are carried out in rented premises, Loreto Secondary School, Wexford will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

## 4.0 Legislation

4.1 The General Data Protection Regulation 2016/679.

4.2 There are 6 principles of data processing outlined in the GDPR, and our CCTV operation ensures that these principles are upheld:

1. Be processed fairly and lawfully
2. Be obtained only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with the purpose for which it was originally collected.
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Kept in a form that permits identification of data subjects for no longer than necessary
6. Processed in a manner that ensure appropriate security of the personal data

## 5.0 Purposes of CCTV

5.1 The CCTV system is operated on Loreto Secondary School, Wexford premises for the safety and security of our students, staff and visitors to our premises as well as protect the information located or stored on the premises, and all assets located at the premises. Loreto Secondary School, Wexford 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.

5.2 We may use the CCTV system in order to investigate any security incidents or accidents at the premises which would involve securing evidence, should such incidents or accidents occur.

## 6.0 Purpose Limitation

6.1 The CCTV system is not used for any other purpose than that outlined in 5.0 above. CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

6.2 Loreto Secondary School, Wexford 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.

## 7.0 Roles & Responsibilities

7.1 The CCTV system on our premises is operated by Loreto Secondary School, Wexford.

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Loreto Secondary School, Wexford
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Loreto Secondary School, Wexford
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at the school 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 tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- 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
- 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
- Co-operate with the Health and Safety Officer of Loreto Secondary School, Wexford in reporting on the CCTV system in operation in the school
- 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"
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only

- 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 Chairperson of the Board.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas
- 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.

7.2 The system is accessed when required by authorised staff and management of Loreto Secondary School, Wexford. All equipment is kept in proper working order.

## 8.0 Summary Description & Technical Specifications for the CCTV System

8.1 The CCTV system is a conventional static system. It records digital images and is equipped with motion detection. It records any movement detected by the cameras in the area under surveillance, together with time, date and location.

8.2 All cameras operate 24 hours a day and 7 days a week.

8.3 The image quality is of such level as to permit the identification of individuals in the area covered by the cameras.

8.4 The cameras are all fixed (there are no pan-tilt-and-zoom cameras), and thus, they cannot be used by operators to zoom in on a target or follow individuals around.

## 9.0 Location of Cameras

9.1 Loreto Secondary School, Wexford has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

9.2 Cameras placed so as to limit recording external areas and are positioned in such a way as to minimise recording of passers-by or of another person's private property.

9.3 There are 16 cameras in total at present, these cameras are located at:

- the front entrance outside
- the front entrance inside (2)
- in the corridor near the Facilities Manager's office
- by each of the coat & bag rooms (2)
- GP area
- hallway leading to sports hall
- emergency exit by catering area
- corridor by principal's office
- corridor by maths room 1
- corridor by St Ignatius room
- corridor beside the Guidance Offices
- corridor towards the Computer Rooms/Library
- corridor beside St John Paul

- corridor beside the Prayer Room

## 10.0 Signage

10.1 Clear signage notifying students, staff and visitors that “CCTV Recording in Use” are displayed in a prominent place where they will be clearly seen.

10.2 The signs contain the following information:

- Identify Loreto Secondary School, Wexford as responsible for the surveillance;
- Purpose of the surveillance;
- Contact details; and
- The image of a camera.

## 11.0 Quality of the Images from CCTV

11.1 It is important that the recorded images are as clear as possible in order that they are effective for the purpose/s for which they are intended.

11.2 The equipment and recording media are maintained on a regular basis to ensure images are of a high quality.

## 12.0 Retaining Information & Processing Images

12.1 It is important that recorded images are only retained for a necessary period of time to fulfil the purpose/s for which they were processed. Therefore, unless the recorded images are required for evidential purposes in legal proceedings, they will not be retained beyond a maximum of 28 days. All recordings are stored at the premises of Loreto Secondary School, Wexford.

12.2 The images/recordings will be stored in a secure environment. 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 Gardai, the Deputy Principal, the relevant Class Teacher, 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.

## 13.0 Access to the Images

13.1 All CCTV recordings and monitoring equipment will be securely stored in a restricted area. The area will be locked when not occupied by authorised personnel.

13.2 Loreto Secondary School, Wexford will ensure that access to, and any disclosure of images to third parties are strictly controlled and documented. This is to ensure that the rights of the individual are maintained, and that the chain of evidence remains intact should the images be required for evidential purposes. Access to these images will normally be through the following: Court Order for Discovery, Freedom of Information access request, or a Data Protection access request.

13.2 In exceptional circumstances, to assist with a formal internal investigation or disciplinary procedure images be disclosed where it can be reasonably expected that the images may help the investigation or prosecution of a sufficiently serious disciplinary offence or a criminal offence.

The CCTV footage may be accessed:

- By An Garda Síochána where Loreto Secondary School, Wexford (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- 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 Loreto Secondary School, Wexford property, or To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Loreto Secondary School, Wexford or
- To individuals (or their legal representatives) subject to a court order.
- To the school's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

#### 14.0 Subject Access Requests (SARs)

14.1 Under the GDPR, individuals have a right of access to any personal information held about them by a Data Controller, which in this case is Loreto Secondary School, Wexford. All requests should be made in writing to The Principal, Loreto Secondary School, Wexford, Spawell Road, Wexford giving a specific and time and date for the relevant recording.

14.2 In the event that we at Loreto Secondary School, Wexford receive a SAR where CCTV images are requested, we will provide this unless the image/s have been deleted and provided also that an exemption/prohibition does not apply to the release.

14.3 If it is not possible for us to easily disguise the images, we may be required to employ the services of an external company to facilitate this.

14.4 Requests will not be complied with where there are insufficient details supplied relating to the date and time of the recording. Correspondence will be sent to the requester advising them of this.

14.5 Should the requester wish to view the images on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant, authorised individuals present.

#### 15.0 Access Requests from An Garda Síochána

15.1 In line with the GDPR, An Garda Síochána are entitled to view personal information about individuals, if it is for the following purposes:

- For the prevention or detection of crime;
- For the apprehension or prosecution of offenders
- When it is required urgently to prevent injury or other damage to the health of a person, or serious loss of or damage to property;
- When it is required by, or under any enactment, or by a rule of law or order of a Court.

15.2 Access requests from An Garda Síochána must be made to the Principal on the official Garda Data Protection Access Request Form.

#### 16.0 Implementation and Reviews

16.1 The 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 Commissioner, An Garda Síochána, Department of Education and Skills, Audit units (internal and external to the school) the CandAG, 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.