

# **CCTV System Policy of St. Paul's College**

**June 2016**

## **1. Introduction**

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Project's, hereafter referred to as 'the school'.

1.2 The system comprises a number of fixed and dome cameras located around the school site. All cameras are monitored from a Central Control Room and are only available to selected senior staff on the Administrative Network

1.3 This Code follows Data Protection Act guidelines.

1.4 The Code of Practice will be subject to review bi-annually to include consultation as appropriate with interested parties.

1.5 The CCTV system is owned by the school.

1.6 If remote viewing is operational adequate guidelines will be in place e.g. located behind a secure firewall.

## **2. Objectives of the CCTV scheme**

- 2.1
- (a) To protect the school buildings and their assets
  - (b) To increase personal safety and reduce the fear of crime
  - (c) To support the Gardaí 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 protect the safety of students and staff
  - (h) To enhance the safeguarding of student welfare, health and well-being.

## **3. Statement of intent**

3.1 The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

3.2 The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

3.3 Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the school, together with its visitors.

3.4.1 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

3.4.2 Unless an immediate response to events is required, staff must not direct cameras 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 CCTV will not be used for any commercial purpose. CDs will only be released to the media for use in the investigation of a specific crime and with the written authority of the Gardaí. CDs will never be released to the media for purposes of entertainment.

3.6 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency 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 Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

#### **4. Operation of the system**

4.1 The Scheme will be administered and managed by the Principal and Deputy Principal (or the acting Principal/Deputy Principal in their absence) in accordance with the principles and objectives expressed in the code. The Year Head team will also have access to and use of the CCTV system for the purposes of monitoring and investigating student behaviour.

4.2 The day-to-day management will be the responsibility of the Principal and Deputy Principal (or the acting Principal/Deputy Principal in their absence) with the overall responsibility resting with the Board of Management (out of hours and weekends).

4.3 The CCTV system will be operated 24 hours each day, every day of the year.

#### **5. Control Room**

5.1 The Principal/Deputy Principal (or the acting Principal/Deputy Principal in their absence) will check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.

5.2 Access to the CCTV equipment will be strictly limited to the Principal/Deputy Principal and Year Head team.

5.3 Unless an immediate response to events is required, staff in the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.

5.4 During the working day when not manned the room must be kept secured.

5.5 Other administrative functions will include maintaining disks and hard disc space, filing and maintaining occurrence and system maintenance logs.

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

#### **6. Liaison**

6.1 Liaison meetings may be held with all bodies involved in the support of the system.

#### **7. Monitoring procedures**

7.1 Camera surveillance may be maintained at all times.

7.2.1 A monitor is installed in the Principal's office to which pictures will be continuously recorded.

#### **8. CD procedures**

8.1 In order to maintain and preserve the integrity of the CDs 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 CD must be identified by a unique mark. School are advised that they should only purchase a system that has the ability to digitally watermark all recordings.

(ii) Only use one CD/DVD per incident and this should not be reused under any circumstances

(iii) The Principal/Deputy Principal (or the acting Principal/Deputy Principal in their absence) shall register the date and time of incidents burned to disc, including reference numbers

(iv) A CD required for evidential purposes must be sealed, witnessed, signed by the Principal or the Deputy Principal (or the acting Principal/Deputy Principal in their absence), dated and stored in a separate, secure, evidence CD store. If a CD is not copied for the Gardaí before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the controller, dated and returned to the evidence CD store

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

8.2 CD's may be viewed by the Gardaí for the prevention and detection of crime, authorised officers of the school for supervisory purposes, authorised demonstration and training.

8.3 A record will be maintained of the release of recordings to the Gardaí or other authorised applicants. A register will be available for this purpose.

8.4 Viewing of recordings by the Gardaí must be recorded in writing and noted in a log book. Requests by the Gardaí can only be actioned under section 29 of the Data Protection Act 1998.

8.5 Should a CD be required as evidence, a copy may be released to the Gardaí under the procedures described in paragraph 8.1 (iv) of this Code. CD's will only be released to the Gardaí on the clear understanding that the recording remains the property of the school, and both the CD 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 Gardaí to pass to any other person the CD or any part of the information contained thereon. On occasions when a Court requires the release of an original CD this will be produced from the secure evidence tape store, complete in its sealed bag.

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

8.7 Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the *Principal/Board of Management*. In these circumstances recordings will normally be 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: €100 for subject access requests; a sum not exceeding the cost of materials in other cases.

## **9. Breaches of the code (including breaches of security)**

9.1 Any breach of the Code of Practice by school staff will be initially investigated by the Principal, in order for him to take the appropriate disciplinary action.

9.2 Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

## **10. Assessment of the scheme and code of practice**

10.1 Performance monitoring, including random operating checks, may be carried out by the Principal/Deputy Principal.

## **11. Complaints**

11.1.1 Any complaints about the school's CCTV system should be addressed to the Principal.

11.2 Complaints will be investigated in accordance with Section 9 of this Code.

## **12 Access by the Data Subject**

12.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

12.2 Requests for Data Subject Access should be made on an application form available from the Principal.

## **13. System Maintenance**

The CCTV system will be maintained in line with requirements and an annual maintenance programme will be put in place.

## **14. Public information**

Copies of this Code of Practice will be available to the public from the School Office.

### Summary of Key Points

- This Code of Practice will be reviewed every two years.
- The CCTV system is owned and operated by the school.
- The Control room will not be manned out of school hours.
- The Control Room is not open to visitors except by prior arrangement and good reason.
- Liaison meetings may be held with the Gardaí and other bodies.
- Recordings will be used properly indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed by authorised school officers and the Gardaí.
- Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the Gardaí.
- Recordings will not be made available to the media for commercial or entertainment.
- Recordings will be disposed of securely by incineration.
- Any breaches of this code will be investigated by the Principal. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Principal.

*\* It is recommended that a small fireproof safe/locker be purchased for the purpose of storing digital media. Digital media recordings should never be stored on the cloud.*

This document was approved by the Board of Management on *(put in full date of meeting)*.

The document will be reviewed by the Board in *(put in proposed review date)*.

**Signed:** \_\_\_\_\_  
Chairperson