

# CCTV POLICY



## 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 all premises operated under the remit of The Institute of Education (hereafter known as “The Institute”).

CCTV systems are installed both internally and externally in premises for the purpose of enhancing the security of buildings and associated equipment at any one time, that a surveillance security system is in operation within and/or in the external environment of the premises during both daylight and night-time hours.

CCTV surveillance at The Institute premises is intended for the purposes of:

- protecting The Institute buildings and assets, both during and after business hours
- promoting the health and safety of staff, students and visitors
- preventing bullying
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- supporting An Garda Síochána in a bid to deter and detect crime
- assisting in identifying, apprehending and prosecuting offenders; and ensuring that The Institute rules and policies are respected

## Scope

This Policy applies to all employees, students and visitors. It relates directly to the location as well as to the use of CCTV, the monitoring, recording and subsequent use of such recorded material.

## General Principles

The Institute has a statutory responsibility for the protection of its property and equipment as well as for providing a sense of security to its employees, students and visitors to its premises.

The Institute owes a duty of care to staff, students and visitors on the premises, under the provisions of the *Safety, Health and Welfare at Work Act 2005* and associated legislation. It utilises CCTV systems and their associated monitoring/recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life in the school by integrating best practices governing the public and private surveillance of its premises.

The use of CCTV systems will be conducted in a professional, ethical and legal manner and any deviation from the use of CCTV security technologies for other purposes is prohibited. The information obtained through the CCTV system may only be released when authorised by the School Principal, following consultation with the Head of Operations. Any requests for CCTV recordings/images from An Garda Síochána will be recorded if any such requests are made.

Video monitoring of public areas, for security purposes, within The Institute premises, is limited to uses that do not violate the reasonable expectation to privacy. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of The Institute 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 Institute. Recognisable images captured by CCTV systems are "personal data". They are, therefore, subject to the provisions of the *Data Protection Acts 1988 and 2003*.

## Justification for use of CCTV

Section 2(1) (c) (iii) of the Data Protection Acts requires that data are "adequate, relevant and not excessive" for the purposes for which they are collected. This means that The Institute 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 a building for security purposes has been deemed to be justified by the The Institute. The system is intended to capture images of intruders or of individuals potentially damaging property or removing goods without authorisation.

## Location of cameras

The Institute 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, shall be positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

## Notification – Signage

The Head of School Operations will provide a copy of this Policy on request to staff, students, parents and visitors to the The Institute premises. This policy describes the purpose and of CCTV monitoring and guidelines for its use. Adequate signage will be placed at each location in which a CCTV camera is installed to indicate that CCTV is in operation

## Storage & Retention

Section 2(1) (c) (iv) of the Data Protection Acts states that data "shall not be kept for longer than is necessary" for the purposes for which they were obtained. Accordingly, the images captured by the The Institute CCTV system will be retained for a maximum of 28 days, except where the images identify a security issue, and the data is then retained specifically in the context of an investigation/prosecution of that issue.

## Access

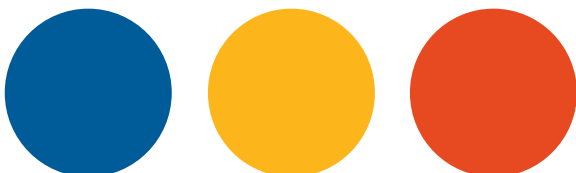
All CCTV monitoring equipment is held in a secure area with restricted access to authorised personnel only. Unauthorised access to that area when it is unoccupied will not be permitted and this area will remain locked when unoccupied by the authorised personnel. In certain circumstances, CCTV footage may be accessed:

- to facilitate the management and administration of school business
- by the School Principal, support staff in order to assist in establishing facts about a case of possible theft of a student's property or unacceptable behaviour of a student, after which the students' parents/guardians will be informed
- by An Garda Síochána as requested by them or where The Institute is required by law to inform them of a crime committed or where it is suspected that anti-social/illegal behaviour is taking place in school property
- by individuals subject to a court order or warrant
- by the The Institute's insurance company where the insurance company requires access in order to pursue a claim for damage done to the school property

## Responsibilities

The Head of School Operations will:

- ensure that the use of CCTV systems is implemented in accordance with the policy as set down by The Institute
- oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the premises
- ensure that the CCTV monitoring 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
- ensure that the perimeter view from fixed camera locations conforms to this policy both internally and externally
- ensure that all areas being monitored are not in breach of an enhanced expectation of privacy of individuals within The Institute and be mindful that no such infringement is likely to take place
- ensure that recordings are stored in a secure place with access by authorised personnel only
- ensure that images recorded are stored for a period not longer than 28 days and will then be erased unless required as part of a criminal investigation or court proceedings
- ensure that camera control is solely used to monitor suspicious behaviour, criminal damage etc., and not to monitor individual characteristics



The Institute of Education reserves the right to update or amend this policy at any time.

## Version Control

**Document Name:** CCTV Policy Version Reference 1.1

**Document Owner:** School Operations

**Approved by:** Derick Clark - Head of Operations

**Date:** November 2022





The Institute of Education  
79 / 85 Lower Leeson Street, Dublin 2.

 /ioedublin  theinstituteofeducationdublin

[www.instituteofeducation.ie](http://www.instituteofeducation.ie) | e: [info@instituteofeducation.ie](mailto:info@instituteofeducation.ie) | t: 01 6613511