

Naíonra Chill Mhantáin

CCTV Policy and Procedure

1. Purpose

Naíonra Chill Mhantáin operates Close Circuit Television Systems (CCTV). The purpose of the surveillance system is to assist the preschool achieve its security objectives of ensuring the personal safety and protection of children, staff, parents and visitors to the centre.

2. Scope and Legal Responsibilities

Naíonra Chill Mhantáin will conform to the provisions of the Data Protection Act 1998 and the Data Protection (Amendment) Act 2003 in relation to the use of CCTV.

3. Policy & Procedure

Data Controller: The Data Controller is Ciara Watson (Preschool Owner). She is responsible for the data/information collected using CCTV.

Location

The following areas are currently monitored by CCTV

Hallway outside the preschool rooms (Naíonra Foyer)

Outside the front door of the preschool trained on the bins area and reaching to the perimeter of the preschool premises.

CCTV Monitor:

The CCTV will record all persons entering and leaving the building and will monitor the hallway. There will be no CCTV in the rooms themselves.

Fairness

Management of Naíonra Chill Mhantáin respects and supports the individual's entitlement to go about his/her lawful business and this is the primary consideration in the operation of CCTV. Although there will be inevitably some loss of privacy with CCTV cameras are not used to monitor the progress or activities in the ordinary course of

lawful business. They are used to address concerns, deal with complaints or support investigations. New employees will be informed immediately, at induction that a surveillance system is in operation. Parents will be informed when they enrol their child. They will be informed of the purpose of the CCTV and what it can and cannot be used to monitor.

Role of the Management

- To respond, to any individual's written request to view a recording that exists of him/her or his/her children.
- To ensure prominent signage is in place that will make individuals aware that they are entering a CCTV area.
- To ensure that areas of privacy (toilets etc) are not monitored using CCTV
- To ensure confidentiality is maintained at all time. Information will only recorded to disc off the hard drive if a complaint/investigation has been lodged (within 30 days) and information will be stored in a locked filing cabinet and will only be available to those directly connected with achieving the objectives of the system.

Traceability

Recordings must be logged and traceable throughout their life in the system. They must be identified by a unique serial number indelibly marked on the media shell.

Time and Date Stamping

The correct time and date must be overlaid on the recording image.

Copy/viewing Recordings

Management will respond to a request to view a recording by allowing the viewing to take place, in the presence of preschool management on the preschool premises. This is to protect other children/staff that may be present on the recording. Copies of recorded information must be strictly controlled and only made in relation to incidents which are subject to investigation. They must only be given to authorised third parties. Copies can only be issued by Ciara Watson (preschool Manager).

Retention

Information will remain on the hard drive of the system for 30 days and will be recorded over when a 30 day period has elapsed.

Access to Recordings

There is no obligation on Naíonra Chill Mhantáin to comply with a request that it considers unreasonable or vexatious or if it involves disclosing identifiable images of third parties. Third parties must give consent. Recordings will however be provided, if required by law or authorised agencies such as the Gardai.

- *Requests for access to recordings must be made in writing*
- *Sufficient information must be provided to locate the relevant recording, a specific date and reasonable time window*
- *Viewings will take place, if appropriate, in the service in the presence of management*
- *Management will have 21 days to respond*
- *If a copy of cd is given to a third party that third party must sign a declaration form that they will not share the cd with anyone else, copy it or use it for unauthorised purposes.*
- *An incident report will be completed for each incident requiring investigation*

If access to or disclosure of the images is allowed, then the following should be documented:

- a. the date and time at which access was allowed or the date on which
- b. disclosure was made
- c. the identification of any third party who was allowed access or to whom disclosure was made
- d. the reason for allowing access or disclosure
- e. the extent of the information to which access was allowed or which was disclosed

- f. the identity of the person authorising such access

Where the images are determined to be personal data images of individuals (other than the data subject) may need to be disguised or blurred so that they are not readily identifiable. If the system does not have the facilities to carry out that type of editing, an editing company may need to be hired to carry it out. If an editing company is hired, then the manager or designated member of staff needs to ensure that there is a contractual relationship between the Data Controller and the editing

Data Subject Access Standards

All staff involved in operating the equipment must be able to recognise a request by data subjects for access to personal data in the form of recorded images by data subjects. Data subjects may be provided with a standard subject access request form which:

- a) indicates the information required, in order to locate the images requested
- b) indicate that a fee will be charged for carrying out the search for the images
- c) The maximum fee which may be charged for the supply of copies of data in response to a subject access request is set out in the Data Protection Acts, 1988 and 2003
- d) ask whether the individual would be satisfied with merely viewing the images recorded
- e) indicate that the response will be provided promptly following receipt of the required fee and in any event within 40 days of receiving adequate information