

CCTV Surveillance Cameras Policy for State Schools falling under the Ministry for Education

Scope

State Schools deal with personal data by means of CCTV camera/s and abide by this policy with regards to the data processed by this means.

Background Information

The data controller for State Schools is the Head of School.

The data protection officer representing the Head of School may be contacted as follows:

ADDRESS

Data Protection Officer
Ministry for Education
Office of the Permanent Secretary
Great Siege Road
Floriana

Telephone

(+356) 2598 1233

Email

dpo.mfed@gov.mt

Data subjects will have a right of access to data being processed as per Chapter III (Article 15) of the General Data Protection Regulation. (Please refer to section relating to Access, below). Data subjects are also hereby informed of their right to lodge a complaint with the Information and Data Protection Commissioner.

The Information and Data Protection Commissioner may be contacted as follows:

ADDRESS

Information and Data Protection Commissioner
Level 2, Airways House
High Street
Sliema SLM 1549
Malta

Telephone

(+356) 2328 7100

Email

idpc.info@idpc.org.mt

Location & Purpose

CCTV surveillance is installed in the State School's premises in any of these areas: reception areas, all schools' entrances, common areas, and administration offices. Affixed notices are placed in prominent and easily visible places within the monitored area. The sole purpose of surveillance is to ensure the security of all those entering the schools (students, staff, parents, etc.). Relevant footage will not be used for any other purpose other than the one intended. Processing for a distinct activity that is not compatible with the original reason for which cameras were installed will only be done if prior notice is given to the data subjects.

In view of Chapter II (Article 5) of the GDPR, the Data Controller justifies the use of a CCTV Surveillance Camera system for the above-mentioned purpose. The recognisable images captured by the cameras will be processed adequately, and in a relevant manner and shall be necessary in relation to the purposes of the processing as per Chapter II Article 6 of the GDPR.

Access to Footage & Data

Access to the CCTV footage is restricted to authorised personnel only. The Data Controller shall authorise further access to footage if so required when relevant to the purpose/s specified above.

Any criminal activity caught on camera will be disclosed to law enforcement authorities after filing a Police report.

State Schools undertake to comply with a strict security policy vis-a-vis the access to recorded images. Any internal access to visual images by the schools or any disclosure of such images further to a request by a law enforcement authority or by the data subject shall be logged and kept as evidence.

Right of Access

Any individual whose personal data is held by State Schools in the form of CCTV recording, can request access to that recording. The Data Controller is obliged to provide access to the footage without disclosing the identity of third parties.

If an individual is not satisfied with the reply as provided or with the manner of access that has been granted, the matter may be referred to the Information and Data Protection Commissioner who will investigate the case and ascertain that the right of access is properly granted.

Right of access requests shall be made in writing and addressed to the Controller.

Retention Period

Personal data is retained for seven (7) days (during the Summer holidays data can be retained for fifteen (15) days by those State schools which do **not** offer Skolasajf services). This period is the necessary period for which the data was obtained. After the lapse of this period, images are deleted. If data is extracted in relation to unacceptable behaviour leading to a criminal investigation it will be held for the period required to satisfy said legal claims, and securely erased after such activities are exhausted.

Conclusion

This policy provides the reasons and means of processing through the use of a CCTV Surveillance System within State Schools whilst ensuring that the rights of the data subjects are not infringed, by processing personal data adequately, not more than necessary and making sure that data is not kept for a period longer than necessary in conformity with Data Protection Legislation.

Date: September 2021