

# St Mary's CE Voluntary Aided Primary School



## CCTV Policy & Code of Practice

Version 1.0

*You will be secure, because there is hope; you will look about you and take your rest in safety.*

*Job 11:18*

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| <b>Produced by</b>                                 | S. Jones                 |  |
| <b>Date approved and agreed by Governing Board</b> | April 2019               |  |
| <b>Review Date</b>                                 | Autumn 2021              |  |
| <b>Date Amended</b>                                |                          |  |
| <b>Governors responsible</b>                       | Finance and GP Committee |  |

### 1. Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Mary's C of E VA Primary School.

The system comprises of a number of dome cameras (9 external and 5 internal) located on the school building. The system does not have sound recording capability. The system is owned and operated by school, the deployment of which is determined by the school's leadership team. All cameras are monitored under restricted access from the Headteacher's office and are only available to nominated Senior Leaders.

The CCTV system is owned by the school.

### 2. Objectives of the CCTV scheme

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment, as well as creating a mindfulness

among the occupants, at any one time, that a surveillance security system is in operation within and / or in the external environs of the premises during both daylight and night hours each day.

CCTV surveillance at St Mary's is intended for the purposes of:

1. To increase the personal safety of staff, students and visitors and reduce the fear of crime.
2. To protect the school building and its assets, both during and after school hours
3. Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
4. To support the Police in a bid to deter and detect crime
5. To assist in identifying, apprehending and prosecuting offenders
6. To protect members of the public and private property
7. Ensuring that the school rules are respected, so that the school can be properly managed.
8. To support investigations, should they be needed, into accidents or near accidents, therefore protecting the welfare of school users

### 3. Statement of intent

The CCTV Scheme is registered with the Information commissioner under the terms of the Data Protection Act 1998 and will comply with the requirements both of the Data Protection Act (2018), General Data Protection Regulations 2016/679 and the Commissioner's Code of Practice. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

The code of practice is published at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

Cameras will be used to monitor activities within the school grounds and in the vicinity of the access gates to identify adverse activity occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of the school's pupils and staff, together with its visitors. None of the static cameras are focused on private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with written authority of the Police. Recordings will never be released to the media for purposes of entertainment. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of GDPR and Data Protection Act 2018.

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.

Warning signs, as required by the code of Practice of the Information Commissioner have been clearly and prominently placed at the main external entrance to the school. Signs contain details of the purpose for using CCTV. In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.



CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including equality, codes of practice for dealing with complaints of bullying & harassment and other relevant policies.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending the school.

The school will not engage in covert surveillance.

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

The CCTV will be administered and managed by the school in accordance with the values and objectives expressed in the code. The day to day management will be the delegated responsibility of the Headteacher and Site Manager. Viewing of recorded images must take place in a restricted area with controlled access. The CCTV system will be operational 24 hours each day, every day of the year, recording all activity. All operators and others with access to images must be aware of the access procedures that are in place.

#### **5. Control and Liaison**

The Site Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional. The school will liaise with SCB Electronic regarding servicing and/or repairs of the system.

#### **6. Monitoring procedures**

Camera surveillance may be maintained at all times and footage continuously recorded and held on system memory.

#### **7. Image storage procedures**

In order to maintain and preserve the integrity of the pen drive or disc 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:

1. Each disc must be identified by a unique reference numbers.
2. Before using, each disc must be cleared of any previous recoding.
3. The person responsible for the recording will register the date and time of the disc recording, including the unique reference number.
4. A disc required for evidential purposes must be sealed, witnessed, signed by the person responsible for the recording, dated and stored in the safe. If a disc is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the responsible member of staff, dated and returned to the safe.

5. If the disc is archived the reference number must be noted.
6. Data is stored for 30 days unless an excerpt is required to support an investigation.

Discs may be viewed by the Police for the prevention and detection of crime. A record will be maintained of the release of discs/excerpts to the Police and other authorised applicants. A register will be available for this purpose.

There will be no disclosure of recorded data to third parties other than authorised personnel e.g. Police and service providers to the school where there would be a reasonable need to access the data e.g. investigators.

Applications received from outside bodies (e.g. solicitors) to view or release discs will be referred to the Headteacher. In these circumstances discs 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. This must be provided within 40 calendar days of receiving the required fee and the request. A fee of £10.00 may be charged in such circumstances (a receipt will be provided). If the decision is taken not to release the images, then the image in question should be held and not destroyed until all legal avenues have been exhausted.

Requests for images should be made to the Data Protection Officer:  
Adrian Stygall, Schools' Liaison Director, Safeguarding Monitor  
adrian@safeguardingmonitor.co.uk Tel: 0330 400 4142  
2 Wellington Place, Leeds, LS1 4AP

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

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for the Headteacher to take the appropriate disciplinary action. Complaints will be dealt with in accordance with the ICO Code of Practice.

## **9. Assessment of the Scheme and Code of Practice**

Performance monitoring, including random operating checks, may be carried out by a nominated member of the Senior Leaders.

## **10. Complaints**

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with the ICO Code of Practice.

## **11. Access by the Data Subject**

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and GDPR. All requests should be made in writing to the Data protection Officer.

DPO: Adrian Stygall, Schools' Liaison Director, Safeguarding Monitor  
adrian@safeguardingmonitor.co.uk Tel: 0330 400 4142  
2 Wellington Place, Leeds, LS1 4AP

Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified e.g. time, date and location. Footage may not be available to view if it includes images of other people, as this would breach the data rights of all other data subjects caught in the footage. The school does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available and it does not breach the data rights of other subjects.

The school will respond to requests within 30 days of receiving the request, but if a request is received outside of the school term, this may not be possible.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **12. Privacy Impact Assessments and Privacy by Design**

CCTV has the potential to be privacy intrusive. The school will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the necessary and proportionate and address a pressing need identified.

## **13. Public Information**

Copies of this Policy/Code of Practice will be available to the public from the school office and the school website.

## **14. Policy Review**

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed on a biennial basis. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.