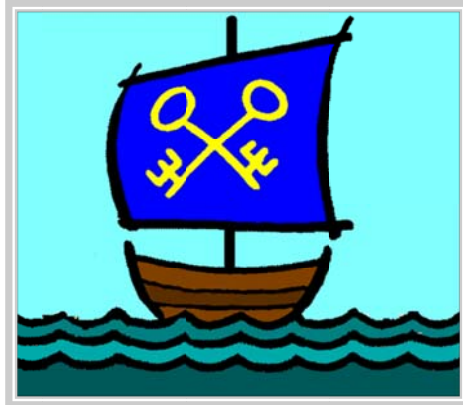


ST PETER'S CATHOLIC PRIMARY SCHOOL



CLOSED CIRCUIT TV (CCTV) POLICY

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Approved by Governors : March 2018

Introduction

- This Policy is in line with the Data Protection Act guidelines <https://ico.org.uk/for-organisations/guide-to-data-protection/> It will also be in line with the General Data Protection Regulations 2018 when these come in to force May 2018.
- St Peter's Catholic Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors and to prevent the loss or damage to school property.
- The system comprises a number of fixed and dome cameras located around the school.
- The system does not have sound recording capability.
- The CCTV is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- The CCTV is monitored centrally.
- Any changes to the CCTV monitoring will be subject to consultation with staff and the school community. If no change is proposed the Policy will be subject to review every two years.
- The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV and the associated images is covered by the Data Protection Act 1998/General Data Protection Regulations 2018. This Policy outlines the school's use of CCTV and how it complies with the Act.
- All authorised operators and employees with access to images will be aware of the procedures that need to be followed when accessing the recorded images. All operators will be trained in their responsibilities under the CCTV Code of practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Existing staff will be briefed as soon as possible after the cameras are installed and for new staff this will be included in the staff handbook.

Objectives of the System

- To protect pupils, staff and visitors;
- To increase personal safety and reduce the fear of crime;
- To protect the school buildings and assets;
- Without prejudice, to protect the personal property of pupils, staff and visitors, though responsibility remains with the owners;
- To support the Police in preventing and detecting crime;
- To assist in identifying, apprehending and prosecuting offenders;
- To assist in managing the school.

Statement of Intent

- The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at - <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>
- CCTV warning signs are clearly and prominently displayed. Signs will contain details of the purpose for using CCTV (see Appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- 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.

Siting the Cameras

- Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.
- The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- CCTV will not be used in classrooms but in areas within school that have been identified by staff as not being easily monitored.
- Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

Storage and Retention of CCTV Images

- Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- All retained data will be stored securely for at least one month.

Access to CCTV Images

- Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

Subject Access Requests (SAR)

- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- The school will respond to requests within 40 calendar days of receiving the written request and fee.
- A fee of £10 will be charged per request.

- 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.

Access to and Disclosure of Images to Third Parties

- There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- Requests should be made in writing to the Headteacher.
- The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.
- There may be occasions when the school is required to provide external bodies (e.g. Police, solicitors, parents etc) with CCTV evidence. This must be organised as follows –

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download video used to record events from the hard drive must be prepared in accordance with the following procedures –

Each download video must be identified by a unique mark, date, time and camera number;

Before use, each download video must be cleaned of any previous recording;

The system manager will register the date and time of any download video, including its reference;

Download video required for evidential purposes must be arranged confidentially and discretely by the system manager, then dated and stored in a separate secure evidence store. If a download video 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 and signed by the system manager, then dated and returned to the evidence store;

If a download video is archived the reference must be noted;

Images may be viewed by the Police and recorded in writing for the prevention and detection of crime and by authorised school management;

A record will be maintained of the release of any download video to the Police or other authorised applicants;

Should images be required as evidence, a copy may be released to the Police under the procedures described in this Policy. Images will only be released to the Police on the clear understanding that the download video (and any images contained thereon) remains the property of the school and download video (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the Police to pass the downloaded video (and images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded video this will be produced from the secure evidence store, complete it its sealed bag;

The Police may require the school to retain the downloaded video for possible use as evidence in the future. Such downloaded video will be properly indexed and securely stored until this is needed by the Police;

Applications received from outside bodies (e.g. solicitors, Police, parents etc) to view or release images will be referred to the school management and made by means of an appropriately authorised request as shown in Appendix C.

Complaints

- Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher, Mrs Kate Crees, in the first instance.

Further Information

Further information on CCTV and its use is available from the following –

- CCTV Code of practice (published by the Information Commissioners Office)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998 / General Data Protection Regulations 2018

The CCTV cameras will be subject to maintenance annually.

Appendix A – Checklist

St Peter’s Catholic Primary School has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of staff, pupils and visitors to the school. It will not be used for other purposes. An annual review of our use of CCTV will be conducted.

	Checked (Date)	Date of Next Review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Email sent to ICO re registering CCTV cameras	April 2019
A system has been chosen which produces clear images which the law enforcement bodies (usually the Police) can use to investigate crime and these can easily be taken from the system when required.	9.2.2018	February 2019
Staff and members of the school community have been consulted about the proposal to install CCTV equipment and will be notified of any changes to the equipment in the future.	December 2017	As appropriate but by December 2018
Cameras have been sited so that they provide clear images.	3.4.2018	April 2019
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	3.4.2018	April 2019
There are visible signs showing that CCTV is in operation.	16.4.2018	April 2019
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	3.4.2018	April 2019
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	3.4.2018	April 2019
Except for law enforcement bodies, images will not be provided to third parties.	3.4.2018	April 2019
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure, advice will be sought from the Information Commissioner as soon as such a request is made.	3.4.2018	April 2019
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	3.4.2018	April 2019

Appendix B – CCTV Signage

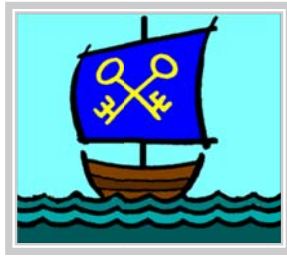
It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following –

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries



Appendix C



DATA PROTECTION ACT 1998 SECTION 29 (3)

I am making enquiries which are concerned with –

- (a) The prevention or detection of crime
- (b) The apprehension or prosecution of offenders

Nature of enquiry –

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The information sought is needed to –

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THIS REQUEST FOR INFORMATION SHOULD BE TREATED AS CONFIDENTIAL AND NOT DISCLOSED UNDER ANY CIRCUMSTANCES

I confirm that the personal data requested are required for that/those purpose(s) and failure to provide the information will, in my view, be likely to prejudice that/those purpose(s).

Signed

Name (Block Capitals)

Date