



**Policy 'owned' by:** Resources Committee of the Governing Body

**Reviewed:** Autumn 2021

**To be reviewed:** Autumn 2023

# 'Learn to love and love to learn; in God's love each one will shine'

St. Andrew's Church of England (VC) Primary School

## CCTV Policy

### SCHOOL AIMS & RATIONALE

**Our School Vision** is led by the example of St Andrew; *"Come, follow me," Jesus said, "and I will send you out to fish for people."* (**Matthew 4: 19**)

**Learn to Love-** As Jesus showed Andrew how to be the very best of men, so we guide and support our children to become the best that they can be. We teach our children to care and have respect for themselves and others, physically, morally and culturally. Our curriculum is built around the fish symbol to show that the love of God and Jesus is at the very heart of all that we do.

**Love to learn-** Just as Jesus immediately saw the character and depth of Andrew at that first meeting on the shores of the Sea of Galilee calling him to be his disciple, so we see and encourage the strengths and interests of all our children. We help them become lifelong learners, encouraging and developing their sense of enquiry and aspiration.

**In God's love each one will shine-** Following Jesus' command; *"Come, follow me," Jesus said, "and I will send you out to fish for people."* (**Matthew 4: 19**) St Andrew brought people to meet, to love and to learn from Jesus. In a similar way we help our children to follow Christian values, to receive the love of God, and to shine that love to others in His grace.

### Objectives

Our School vision is realised in this policy as part of our duty to care and respect the safeguarding and security of all stakeholders in the school.

### Introduction

At St Andrews Church of England V.C Primary School we use 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,
- to prevent the loss or damage to school property
- to assist in identifying, apprehending and prosecuting offenders in the event that a crime is committed.

The system is owned and operated by the school and the deployment of which is determined by the school's leadership team in consultation with the school's Governing Body.

The system comprises a number of fixed dome cameras. The CCTV is monitored centrally from the School Office by the Office Staff and/or Senior Leadership team

Changes to, CCTV monitoring will be subject to consultation with staff and the school community.

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 and any sound recordings is covered by the Data Protection Act (DPA) 1998 and the subsequent General Data Protection Requirement (GDPR) 2018. This policy outlines the school's use of CCTV and how it complies with these acts.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school data controller 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 and sound.

### **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/about-the-ico/ico-and-stakeholder-consultations/cctv-code-of-practice-revised/>

CCTV warning signs will be clearly and prominently placed around the school. 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 DPA and GDPR. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes the outdoor areas and entrances to the premises.

CCTV will not be used in classrooms. Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring (detailed below).

### **Covert Monitoring**

The school may in exceptional circumstances set up covert monitoring. For example:

- i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Head Teacher and Chair of Governors. Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

### **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. Data will be retained for 28 days before being automatically deleted from the system.

### **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. In line with our role in safety and security and the public interest where our CCTV data is requested by external public authorities (such as the Police) we will share CCTV data if appropriate.

### **Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the DPA and GDPR.

All requests should be made in writing to the Head Teacher.

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 28 calendar days of receiving the written request.

The school reserves the right to refuse access to, or amend, CCTV footage where this would involve the disclosure of data about other individuals or infringe other legal rights or requirements.

### **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 Head Teacher.

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.

### **Complaints**

Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher in the first instance.

Further Information

Further Information on CCTV and its use is available from the ICO (<https://ico.org.uk/>)

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### **Appendix A- Principles of the Data Protection act and General data Protection Regulation**

In its administration of its CCTV system, the school complies with the Data Protection Act. Due regard is given to the data protections principles embodied in the Data Protection Act.

These principles require that personal data shall be:

- a) Processed fairly and lawfully;
- b) Held only for specified purposes and not used or disclosed in any way incompatible with these purposes;
- c) adequate, relevant and not excessive
- d) accurate and kept up to date
- e) be kept longer than necessary for particular purpose;
- f) processed in accordance with the rights of the individuals;
- g) kept secure; and
- h) not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.

From 25 May 2018, the school will also comply with the General Data Protection Regulation. Due regard will be given to the data protection principles contained within Article 5 of the GDPR which provide that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date
- e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed; and;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

**A Data Protection Impact Statement has been completed.**

## Appendix B – CCTV Signage



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