



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

CCTV Policy

Introduction

St Andrew's Church of England (VC) Primary School uses closed circuit television (CCTV) images to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, to deter crime to prevent the loss or damage to school property and to assist in identifying, apprehending and prosecuting offenders in the event that a crime is committed. The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team in consultation with school governors. The CCTV may be monitored by the Senior Leadership Team and Office Staff from within the school. Changes to CCTV monitoring will be subject to consultation with staff and the school community. The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act. 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 are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound. The CCTV system will be operated 24 hours each day, every day of the year.

Statement of Intent

In its processing of the CCTV system, the School complies with the relevant data protection law and aims to fulfil its obligation to individual's data privacy in line with the principles of the Data Protection Act and the General Data Protection Regulation (Appendix A). The school is the data controller for the images produced by the CCTV system.

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 will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (Appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs displayed. The planning and design has endeavoured to ensure that the system 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 includes outdoor areas. CCTV coverage will include the grounds, perimeter of the building and the front entrance and car park.

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.

Covert Monitoring

The school may in exceptional circumstances set up covert monitoring. For example: 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; Where notifying individuals about the monitoring would seriously prejudice the reason for making the recording. In these circumstances authorisation must be obtained from the Headteacher

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 toilets.

Storage and Retention of CCTV images

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

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. All requests should be made in writing to the Headteacher.

In order to locate the images, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

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.

Complaints

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

Further Information

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

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 protection 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 those purposes;
- c) adequate, relevant and not excessive;
- d) accurate and kept up to date;
- e) be kept longer than necessary for the particular purpose;
- f) processed in accordance with the rights of 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 unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures

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 is to ensure that this requirement is fulfilled.

Policy written: May 2018

Policy Review Date: July 2019