



# St Mary's CE Primary School CCTV Policy

(Code of Practice)

## 1 Introduction

1.1 St Mary's Primary School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.

1.2 The system comprises a number of fixed cameras.

1.3 The system does not have sound recording capability.

1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

1.5 The CCTV is monitored centrally from the school reception office

**Access to the images is controlled by:**

**Mr Neil Gurman (Data Protection Officer and Headteacher),  
Helen Collinge (School Bursar/Data Controller)  
Mr Cliff Smith (Site Supervisor).**

1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.

1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the GDPR 2018. The use of CCTV, and the associated images are covered by the GDPR 2018. This policy outlines the school's use of CCTV and how it complies with the GDPR.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.

**Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller' and School Bursar, Helen Collinge will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.**

## **Purpose of CCTV**

St Mary's Primary School has installed a CCTV system to:

- Increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime.
- Protect school buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To support the police in a bid to deter and detect crime
- Assist in prevention and detection of crime
- Assist with identification, apprehension and prosecution of offenders
- Assist with the identification of activities/actions that might result in disciplinary proceedings against staff and students
- Monitor the security of the building

The system will be provided and operated in a way that is consistent with an individual's right to privacy.

## **2 Statement of Intent**

2.1 The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV 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>

2.2 CCTV warning signs are clearly and prominently placed at the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. 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 within the controlled area.

2.3 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver 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.

## **3 Siting the Cameras**

3.1 Cameras are sited so that they only captured 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 GDPR.

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor/indoor areas.

3.3 Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

## 4 Covert Monitoring

Prior to authorisation the requesting applicant must have demonstrated and documented that all reasonable procedures and practices were put in place to prevent suspected illegal or unauthorised activity from taking place.

4.1 It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so.

4.2 The school may, in exceptional circumstances, determine a sound reason to set up covert monitoring. The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom. The school may require legal advice in approving and assessing the need for covert recording in all instances.

For example:

- i) Where there is good cause to suspect that an illegal or unauthorised action, 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.

**4.3 In these circumstances authorisation must be obtained from the Headteacher – Mr Neil Gurman and the school's 'Data Controller' Mrs Helen Collinge before any commencement of such covert monitoring.**

4.4 Covert monitoring must cease following completion of an investigation. Any such covert processing will only be carried out for a limited and reasonable period of time, consistent with the objectives of making the recording and will only relate to the specific suspected illegal activity, inappropriate or unauthorised activity.

Unless required for evidential purposes or the investigation of crime or otherwise required by law, covertly recorded images will be retained for no longer than 31 days from the date of the recording. A record of destruction will be made in confirmation on the authorised request to make covert recordings.

4.5 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, changing areas etc.

The CCTV system will not be used to:

- Provide images to the world wide web
- Record sound
- Disclose to the media

## **5. Image Viewing and Download Procedure**

5.1 Recordings may be viewed by the police in the presence of the premises manager – Mr Neil Gurman, following a specific data access formal request.

5.2 Otherwise permission to view CCTV data will depend on the subject and potential investigation.

5.3 The premise manager Mr Neil Gurman, is authorised to review CCTV recordings to ascertain the circumstances involving students, staff, contractors, visitors/public incidents.

5.4 The premise manager Mr Neil Gurman may authorise members of SLT to view the CCTV images with them relating to a potential student incident where it may be appropriate to see the footage.

5.5 Potential incidents involving staff may be viewed in the presence of the premise manager – Mr Neil Gurman using the appropriate data access procedure.

Note: The premise manager may take action to secure footage that may relate to an incident involving staff and others until such time it has been decided that it is required for viewing and/or download or it can be erased.

## **6. Download Procedure**

6.1 Should a download be required as evidence, an electronic copy may only be made by the premise manager – Mr Neil Gurman.

6.2 Where this is to be released to the Police this will only be released to the Police on receipt of a completed Data Release Form and sight of the warrant card/proof of identity.

6.3 Where this is requested by an SLT member relating to a student, a CCTV Data Release Form will be completed for the premise manager – Mr Neil Gurman.

6.4 CCTV footage may be released for civil proceedings at the written request of a solicitor or insurance company. A CCTV Data Release Form will be completed for the Premise manager – Mr Neil Gurman.

6.5 All requests for downloads will be retained for 12 months or after the incident that the download relates to has been closed.

6.6 Downloads requested by other parties and for the purposes outside the scope of this policy are not permitted.

## **7 Storage and Retention of CCTV images**

7.1 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.

7.2 All retained data will be stored securely at all times and permanently deleted as appropriate / required.

## **8. Breaches of this policy**

8.1 Any suspected breach of this policy by school staff will be considered under the school's Disciplinary Policy and Procedures.

## **9. Data Protection Act 1998**

9.1 For the purpose of the General Data Protection Regulation (GDPR) the designated data controller in school is Mrs Helen Collinge.

9.2 CCTV digital images, if they show a recognisable person, are personal data and are covered by the GDPR. This policy is associated with the school's GDPR Policy, the provisions of which should be adhered to at all times.

9.3 The school has registered its processing of personal data (including CCTV) with the Information Commissioner's Office (ICO).

9.4 Where new cameras are to be installed on school premises, Part 4 of the ICO's CCCTV Code of Practice will be followed before installation:

- The appropriateness of and reasons for using CCTV will be assessed and documented.
- The purpose of the proposed CCTV system will be established and documented.
- Responsibility for day to day compliance with this policy will be established and documented.

## **10 Access to CCTV images**

### **Subject Access requests (SARs)**

10.1 The General Data Protection Regulation gives individuals the right to access personal information about themselves, including CCTV images.

10.2 All requests for access to view/copy CCTV footage by individuals should be made in writing to the Data Controller –

Mrs Helen Collinge, email: [bursar@rawtenstall-st-marys.lancs.sch.uk](mailto:bursar@rawtenstall-st-marys.lancs.sch.uk)

Requests for access to CCTV images must include:

- The reason for the request
- The date and time the images were recorded
- Information to identify the individual, if necessary
- The location of the CCTV camera
- Proof of identity

10.3 The school will respond promptly and at the latest within 30 calendar days of receiving the request processing fee of £10 and sufficient information to identify the images requested.

10.4 If the school cannot comply with the request, the reasons will be documented. The requester will be advised of these in writing, where possible.

## **10 Access to and Disclosure of Images to Third Parties**

10.1 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).

10.2 Requests for images / data should be made in writing to the Head Teacher.

10.3 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.

## **11 Complaints**

11.1 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 following:

- CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office) Version 1.2
- [www.ico.org.uk](http://www.ico.org.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998
- GDPR (wef 25 May 2018)

## Appendix A

This CCTV system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the schools 'Data Controller'. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose (which is a legal requirement of the current GDPR Regulations 2018).

St Mary's School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the schools community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

|  | <b>Checked<br/>(Date if<br/>appropriate)</b> | <b>By</b>   | <b>Date of next review</b> |
|--|--|-------------|----------------------------|
| There is a named individual who is responsible for the operation of the system.  | Yes  | Neil Gurman |                            |
| 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.       | Yes  | Neil Gurman |                            |
| Staff and members of the school community will be consulted about any proposal to install/amend CCTV equipment or its use as appropriate.  | Yes  | Neil Gurman |                            |
| Cameras have been sited so that they provide clear images  | Yes  | Neil Gurman |                            |
| Cameras have not been positioned to minimise the capture of images of person's not visiting the site.  | Yes  | Neil Gurman |                            |
| There are visible signs showing that CCTV is in operation.   | Yes  | Neil Gurman |                            |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.   | Yes  | Neil Gurman |                            |
| 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.  | Yes  | Neil Gurman |                            |
| Except for law enforcement bodies, images will not be provided to third parties.   | Yes  | Neil Gurman |                            |
| The organisation know how to respond to individuals making requests for copies of their own images. If unsure the data controller knows how to seek advice from the ICO as soon as such a request is made. | Yes  | Neil Gurman |                            |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images.   | Yes<br>(daily checks)                        | Neil Gurman |                            |

## **APPENDIX B – CCTV SIGNAGE**

It is a requirement of the GDPR Regulations 2018 to notify people entering a CCTV protected area is monitored by CCTV and that the pictures are recorded. The school is to ensure 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 any enquiries.

**Policy written by – Mr Neil Gurman**

**Date reviewed – December 2022**

**Date of next review – December 2023**