

St Joseph's Catholic Primary School, Malmesbury



“Walking in the footsteps of Jesus, loving and serving together”

CCTV Policy

Introduction

St Joseph's Catholic Primary School is fully committed to the safety of its staff, students and visitors and to this extent has invested in the security of its buildings and facilities. The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at the School.

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 2018. The person ultimately responsible for data protection within the School is the Head Teacher and Governing Body.

The system comprises of fixed and dome cameras located externally at the entrance to the site. Additionally a further camera is externally located at the wooden gate entrance on the road. All cameras may be monitored and are only available for use by approved members of staff.

The CCTV system is owned by the school and will be subject to review annually.

1. Objectives of the CCTV System

The objectives of the CCTV system are:

1. To protect the school buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
2. To increase the personal safety of staff, students and visitors and reduce the fear of physical abuse, intimidation and crime.
3. To support the police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders on the school site.
5. To protect members of the public and private property.
6. To assist in the usage and management of the school building on a day to day basis.
7. To assist in the investigation of incidents, e.g. bullying and vandalism



2. Statement of Intent

1. The CCTV system will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act 2018 and the Commissioner's Code of Practice.
2. The School will comply with the Data Protection Act 2018, whether it be information, recordings and downloads which relate to the CCTV system.
3. Cameras will be used to monitor activities within the School buildings, premises and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the occupants within the School, together with its visitors.
4. Staff have been instructed to ensure that static cameras will not focus on private homes, gardens and other areas of private property.
5. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation from the Headteacher being obtained.
6. Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.
7. The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.
8. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the School CCTV.
9. If necessary, permission will be sought from anyone else who may be identifiable before any footage is released. For example, a victim will be asked for permission before release.

3. Operation of the System

1. The system will be administered and managed by the Headteacher and School Business Manager, in accordance with the principles and objectives expressed in this Policy.
2. The day-to-day management will be the responsibility of the School Business Manager.
3. The CCTV system will be in operation 24 hours each day, every day of



the year.

4. Any data recorded on the system will be retained in line with the School's Data Retention Policy and securely disposed of once the retention period has ended.

4. CCTV System

1. The School Business Manager will check and confirm the efficiency of the system on a daily basis and in particular that the equipment is properly recording and that cameras are functional.
2. Access to the CCTV will be strictly limited to the members of staff approved by the Headteacher.
3. Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
4. The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Headteacher and Governing Body. If the member of public wishes to see CCTV footage they must apply to do so to the Head teacher and Governing Body. Viewing must be in person, on site. If permission is granted, the member of the public must be accompanied throughout the visit by a member of staff.
5. Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV System make this a necessity.
6. In the event of an emergency which requires an immediate contact with an emergency service to be contacted by a member of staff the emergency procedures identified in the Health and Safety Policy will be adhered to.

5. Liaison

1. Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

6. Monitoring Procedures

1. Camera surveillance may be maintained at all times for monitoring purposes.

7. Video Download Procedures

1. Recordings may be viewed by the police for the prevention and detection of crime. Permission to do this will be given from the Headteacher or Data Protection Officer.
2. A record will be maintained of the release of downloads to the police or



other authorised applicants. A register will be available for this purpose and will be kept by the Data Protection Officer.

3. Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned under the Data Protection Act 2018.

4. Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the file remains the property of the School, and both the file and information contained on it are to be treated in accordance with this Policy. The School also retains the right to refuse permission for the police to pass to any other person the file or any part of the information contained thereon.

5. Applications received from outside bodies (e.g. solicitors, students, staff, parents and carers) to view or release downloads will be referred to the Headteacher and Governing Body. In these circumstances downloads 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. Requests must be received in writing.

6. Applications received from within the School (e.g. made by staff as part of the legal basis for completing tasks associated with their job) to view CCTV footage must be made on the bespoke CCTV viewing application forms. These will be referred to the Headteacher for that officer's decision whether to permit viewing.

8. Breaches of the Policy (including breaches of security)

1. Any breach of this Policy by School staff will be initially investigated by the Head teacher and Governing Body, in accordance with the Disciplinary Policy and/or Complaints Policy, as appropriate.

2. Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

9. Assessment of the Scheme and CCTV Usage Policy

1. Performance monitoring, including random operating checks, may be carried out by the approved persons.

10. Complaints

1. Any complaints about the School's CCTV system should be addressed to the Head teacher.



2. Complaints will be investigated in accordance with Section 9 of this Policy

11. Access by the Data Subject

1. The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV.
2. Requests for Data Subject Access should be made in writing to the Headteacher and Governing Body
3. Requests to view any CCTV footage, must be submitted on the School CCTV request forms kept in the school office.
4. All subjects identifiable in the footage, must agree to the footage being released.
5. Any requests are subject to the School Data Protection Policy and any conditions contained therein. The Data Protection Policy overrules the School CCTV Policy in cases of dispute.
6. The data provider undertaking the searching is allowed to charge a reasonable fee.

12. Public Information

Copies of this Policy will be available to the public, by making a request to the School. A copy of this Policy will be located on the school website for information purposes to members of staff.

13. System Maintenance and Monitoring

1. The system will be maintained in accordance with the Data Protection Act 2018.
2. The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspectorate (NSI).
3. It will be the responsibility of School Business Manager to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.
4. It will be the responsibility of School Business Manager to arrange regular system reviews with the maintaining company.

14. Summary of Key Points

- This CCTV Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by the School.



- The CCTV system cannot be accessed by visitors/ members of the public except by prior arrangement with the Headteacher and Governing Body and with good reason.
- Liaison meetings may be held with the police and other bodies.
- Copies of downloads may only be viewed by authorised staff and the police.
- Copies required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Policy.
- Any breaches of this Policy will be investigated by the Head teacher and Governing Body. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Head teacher or the Chair of Governors.
- The system will be maintained on a regular basis by an approved contractor.

Arrangements for monitoring, evaluation and review

Responsible committee for monitoring & evaluation:	Resources Committee
Policy reviewed by:	Resources Committee
Policy review & approval date:	July 2020
Next review date:	September 2021