

# St Mary's Catholic Primary School

## CCTV Policy

Sep 2018

Version and Date		Action/Notes
1.0	Aug 2018	Preparation for approval
1.1		

### Basis of preparation

This policy has been adopted in response to the introduction of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. It complements other policies, but mainly the Data Protection and Freedom of Information policy. It applies solely to the CCTV system installed in the school.

The initial template for this policy was sourced from Judicium and Stone King.

### Purpose

The purpose of this policy is to manage and regulate the use of surveillance and CCTV systems at the school and ensure the following: -

- The school complies with the GDPR;
- The images that are captured are usable for the purposes required;
- Those persons whose images are being captured are assured that the images are being handled in accordance with data protection legislation;

This policy covers the use of CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes: -

- Observing what an individual is doing
- Taking action to prevent a crime
- Using images of individuals that could affect their privacy

The school does not condone the use of covert surveillance when monitoring the school's staff, pupils, contractors, visitors and/or volunteers. Covert surveillance would only be operable in extreme circumstances.

### Introduction

The school recognises that CCTV systems can be privacy intrusive. For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

Review of this policy shall be repeated regularly and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

## Objectives

The purpose of the CCTV system is to assist the school in reaching these objectives:

- To protect pupils, staff and visitors against harm to their person and/or property.
- To increase a sense of personal safety and reduce the fear of crime.
- To protect the school buildings and assets.
- To support the police in preventing and detecting crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence.

## System and System Management

### 1. Protocols

As an aid to ensuring the school meets the needs of this policy and limits access to relevant personal data the school will follow these protocols: -

- The system will be registered with the ICO in line with general data protection legislation;
- The system is a closed digital system which does not record audio;
- Warning signs will be placed throughout the premises where the equipment is active as mandated by the ICO's Code of Practice;
- Whereas the system will be designed for maximum efficiency and effectiveness it is recognised that the school cannot guarantee that every incident will be detected or covered;
- Recordings will be held in the system's memory for no longer than 30 days;
- Deletion of records in the system will be automatic;
- The system is fixed and will not normally be trained on individuals unless a response to an incident is required;
- The surveillance system will not be trained on private vehicles or property outside the perimeter of the school.

### 2. The CCTV system

The details of the system installed are as follows: -

CAMERA TYPE	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
		Y/N	Y/N	S/F

Hikvision DS-2CE16D5T-VFIT3	Front of school looking towards the main pedestrian entrance	N	Y	F
Hikvision DS-2CE16D5T-VFIT3	Attached to small Hall looking out over playground and field	N	Y	F
Hikvision DS-2CE16D5T-VFIT3	Attached to small Hall looking out towards the main vehicular entrance	N	Y	F
Hikvision DS-2CE16D5T-VFIT3	Front of school looking over car park nearest to the admin building	N	Y	F

The recorder is a Hikvision DS-7300HGHI-SH 8 way high definition digital recorder with 2tb of hard drive. All recordings are time limited to 30 days. Recordings are kept on a loop within the system's memory to be automatically deleted after 30 days.

### 3. System Management

The CCTV system managers will be the Headteacher, Site Manager and the Office staff. The Headteacher will have ultimate responsibility. System allocation and access will be administered by the school's IT support provider under the direction of the Headteacher.

Access to the CCTV system and data shall be password protected in line with the school's Information Security policy.

The system is designed to run continuously day and night throughout the year.

As well as annual servicing, the system will be periodically checked to ensure the following: -

- the efficiency of the system;
- the system is recording properly;
- the cameras are functioning;
- cameras are placed to best achieve the objectives set out in this policy.

Unless otherwise directed, cameras will not be directed at an individual, their property or a specific group of individuals without authorisation

The system and the data collected will only be available to the Headteacher, Site Manager and the Office staff or an appropriate member of the staff as determined by the Headteacher.

Where a person other than those mentioned above requests access to the CCTV data or system, the Headteacher must be satisfied of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused. Where applications are made from outside bodies to view or release images these will be referred to the school's Data Protection Officer and a decision made by the Headteacher in consultation with the schools' Data Protection Officer and, if necessary, lawyers.

**4. Complaints about the use of CCTV**

Any complaints in relation to the school's CCTV should be addressed to the Headteacher.

**5. Request for Access by a Data Subject**

The Data Protection Act provides data subjects (those whose images have been captured by the CCTV system and can be identified) with a right to data held about themselves including those obtained by CCTV. Requests for such data should be made to the Headteacher in accordance with the school's Data Protection and Freedom of Information policy.

This Policy is reviewed by the Resources Committee at least every two years and must be signed by the Chair of Governors and Headteacher.

Policy Reviewed: Autumn term 2018

Next Review: Autumn term 2020

Signature of Chair of Governors:

Signature of Headteacher: