

St. Matthew's C of E Primary School Policies

Our Policy: CCTV

Approval Date: September 2021
Review Date: September 2022

1. Legal framework

1.1. This policy has due regard to legislation including, but not limited to, the following:

- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The General Data Protection Regulation
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

1.2. This policy has been created with regard to the following statutory and non-statutory guidance:

- ICO (2017) 'Overview of the General Data Protection Regulation (GDPR)'
- ICO (2017) 'Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'

2. Definitions

2.1. For the purpose of this policy a set of definitions will be outlined, in accordance with the CCTV code of conduct:

- **Surveillance** – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable.
- **Overt surveillance** – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.
- **Covert surveillance** – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance.

2.2. Any overt surveillance footage will be clearly signposted around the school.

3. Purpose and justification

- 3.1. The school will only use the CCTV camera for the safety and security of the school and its staff, pupils and visitors.
- 3.2. The CCTV will be used as a deterrent for violent behaviour and damage to the school.
- 3.3. The school will only conduct surveillance as a deterrent in the main school foyer and under no circumstances will CCTV cameras be present in school classrooms or any changing facility.

4. The data protection principles

- 4.1. Data collected from the CCTV will be:
 - The use of the CCTV camera will be fair and used only for a safety precaution in the School foyer.
 - Processed lawfully, fairly and in a transparent manner in relation to individuals.
 - Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
 - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
 - 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.
 - The CCTV will not be used to monitor staff or children it will only be used for the security of the school main doors.

5. Objectives

- 5.1. The school has only one CCTV that will be used to:
 - Maintain a safe environment in the school foyer.
 - Ensure the welfare of pupils, staff and visitors.
 - Deter criminal acts against persons and property.
 - Assist the police in identifying persons who have committed an offence.

6. Protocols

- 6.1. The CCTV will be registered with the ICO in line with data protection legislation.
- 6.2. The CCTV system is a closed digital system which does not record audio.
- 6.3. A warning sign has been placed in the foyer where the CCTV camera is active, as mandated by the ICO's Code of Practice.
- 6.4. The CCTV system will not be trained on individuals.

7. Security

- 7.1. Access to the CCTV system, software and data will be strictly limited to authorised operators and will be password protected.
- 7.2. The school's authorised CCTV system operators are:
 - Name of Headteacher Miss Ritchie.
 - Name of DPO Mr Sermon.
 - Name of data controller Mrs Saunders.
 - Name of data processor Miss Spain.
- 7.3. The main control facility is kept secure.
- 7.4. The CCTV system will be tested for security flaws regularly to ensure that they are being properly maintained at all times.
- 7.5. The CCTV system will not be intrusive.
- 7.6. There is only one camera and if that present a fault it will be repaired immediately as to avoid any risk of a data breach.
- 7.7. A visual display monitor is located in the main office.

8. Privacy by design

- 8.1. The use of the CCTV camera will be critically analysed using a DPIA, in consultation with the DPO.
- 8.2. If the DPIA reveals any potential security risks or other data protection issues, the school will ensure they have provisions in place to overcome these issues.
- 8.3. The school will ensure that the installation of the CCTV systems will always justify its means.

9. Code of practice

- 9.1. The school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

- 9.2. The CCTV camera is only placed where it will not intrude on anyone's privacy and is necessary to fulfil their purpose.
- 9.3. All surveillance footage will be kept for 5 weeks for security purposes; the headteacher and the data controller are responsible for keeping the records secure and allowing access.
- 9.4. The school has a CCTV camera for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils and visitors.
- 9.5. The CCTV camera is owned by the school and images from the system are strictly controlled and monitored by authorised personnel only.
- 9.6. The school will ensure that the CCTV camera is used to create a safer environment for staff, pupils and visitors to the school, and to ensure that its operation is consistent with the obligations outlined in data protection legislation.
- 9.7. The CCTV camera will:
 - Be use only for the sharing of information to protect the school from burglaries.
 - Be transparent and include a contact point, the DPO, through which people can access information and submit complaints.
 - Have clear responsibility and accountability procedures for images and information collected, held and used.
 - Have defined policies and procedures in place which are communicated throughout the school.
 - Only keep images and information for as long as required.
 - Restrict access to retained images and information with clear rules on who can gain access.
 - Consider all operational, technical and competency standards, relevant to the CCTV system and its purpose, and work to meet and maintain those standards in accordance with the law.
 - Be subject to stringent security measures to safeguard against unauthorised access.
 - Be regularly reviewed and audited to ensure that policies and standards are maintained.
 - Only be used for the purposes for which it is intended, including supporting public safety, the protection of pupils, staff and volunteers, and law enforcement.

10. Access

- 10.1. Under the GDPR, individuals have the right to obtain confirmation that their personal information is being processed.
- 10.2. All images belong to, and remain the property of, the school.
- 10.3. Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings, will be assessed by the headteacher, who will consult the DPO, on a case-by-case basis with close regard to data protection and freedom of information legislation.
- 10.4. Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:
 - The police – where the images recorded would assist in a specific criminal inquiry
 - Prosecution agencies – such as the Crown Prosecution Service (CPS)
 - Relevant legal representatives – such as lawyers and barristers
 - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000
- 10.5. Requests for access or disclosure will be recorded and the headteacher will make the final decision as to whether recorded images may be released to persons other than the police.

11. Monitoring and review

- 11.1. This policy will be monitored and reviewed on an annual basis by the DPO and the headteacher.
- 11.2. The headteacher will be responsible for monitoring any changes to legislation that may affect this policy, and make the appropriate changes accordingly.
- 11.3. The headteacher will communicate changes to this policy to all members of staff.

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Date agreed by Governors:	September 2021
Next Review Date:	September 2022