

# St. Matthew's C of E Primary School Policies

## **Our Policy:** CCTV

**Approval Date:** July 2019  
**Review Date:** July 2020

## 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. St Matthews C of E Primary School does not condone the use of covert surveillance when monitoring the school's staff, pupils and/or volunteers. Covert surveillance will only be operable in extreme circumstances.
- 2.3. 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 Emmett.
  - 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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| <b>Date of Policy:</b>           | <b>July 2019</b> |
| <b>Date agreed by Governors:</b> | <b>July 2019</b> |
| <b>Next Review Date:</b>         | <b>July 2020</b> |