

CLOSED CIRCUIT TV POLICY (CCTV) POLICY

DEFINITIONS

- "the school" – St. Nicholas School
- "Data Controller"- The school's Data Controller for CCTV is Mr Stephen King
- "Site Manager"- The school's Site Manager.
- "CCTV Operator"- Employees of the school with the skills and permission to operate the C

STATEMENT

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The purpose of this policy (which is based on the Babcock Model Policy) is to regulate the management, operation and use of the closed circuit television (CCTV) system at the school.

The system comprises a number of static cameras located around the school site. All cameras can be monitored from the Main Office. This Code follows Data Protection Act guidelines.

The CCTV system and data is owned by the school. The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and Commissioner's Code of Practice which can be found online at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>.

The school will treat the system and all information, documents and recordings obtained and used, as data which are protected by the Data Protection Act. The system installed is compliant with the Data Protection Act, Human Rights Act and Regulatory Investigation Powers Act.

PURPOSE OF THE CCTV SYSTEM

The purpose of the school CCTV system is:

- To protect the school buildings and assets of the school.
- To increase personal safety and reduce the fear of crime.
- To support the Police in a bid to deter and detect crime.
- To assist in managing the school.

Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school and its staff, students and visitors. Cameras are focussed on the school buildings and around entrances/exits.

Materials of knowledge secured as a result of CCTV will not be used for any commercial purpose. Information transferred to CD/DVD (or other appropriate media) will only be used for the investigation of a specific crime or incident. Release to the media would only be allowed with the written authority of the police if this was required by them as part of a police investigation.

Warning signs, as required under the Data Protection Act, have been placed at key points in the building i.e. externally and in the school foyer.

SCOPE

The policy applies to all employees and temporary/casual workers of the School including volunteers and parent helpers. The policy also applies to all pupils, parents / carers and visitors

POLICY INTO PRACTICE

SITING THE CAMERAS

Cameras will be sited so they only capture 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 the Data Protection Act.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas. CCTV will not be used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored. Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring. The Data Protection Lead has a copy of the map showing where each camera is sited.

COVERT MONITORING

The school may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- In these circumstances authorisation must be obtained from a member of the senior leadership team.
- Covert monitoring must cease following completion of an investigation.
- 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.

STORAGE AND RETENTION OF CCTV IMAGES

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. All retained data will be stored securely.

ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

SUBJECT ACCESS REQUESTS

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act. All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The school will respond to requests within 40 calendar days and there will be no fee, unless the request is excessive. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES

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). Requests should be made in writing to the Headteacher. 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.

COMPLAINTS

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

FURTHER READING

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2015 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998

MONITORING AND REVIEW

To be reviewed on a yearly basis by the Deputy Head Teacher and will keep up to date with any statutory legislation and any changes will go via the Governing body.

EQUALITY, SAFEGUARDING AND EQUAL OPPORTUNITIES

St Nicholas School, in all policies and procedures will promote equality of opportunity for students and staff from all social, cultural and economic backgrounds and ensure freedom from discrimination on the basis of membership of any group, including gender, sexual orientation, family circumstances, ethnic or national origin, disability (physical or mental), religious or political beliefs.

St Nicholas School aims to:

- Provide equal opportunity for all
- To foster good relations and create effective partnership with all sections of the community
- To take no action which discriminates unlawfully in service delivery, commissioning and employment
- To provide an environment free from fear and discrimination, where diversity, respect and dignity are valued.

All aspects of Safeguarding will be embedded into the life of the school and be adhered to and be the responsibility of all staff.

LINKS TO OTHER POLICIES

Safeguarding
Data Protection Policy
Health and Safety Policy

STEPHEN KING
REVIEWED TERMS 5
RATIFIED BY THE FULL GOVERNING BODY – 20 JUNE 2018