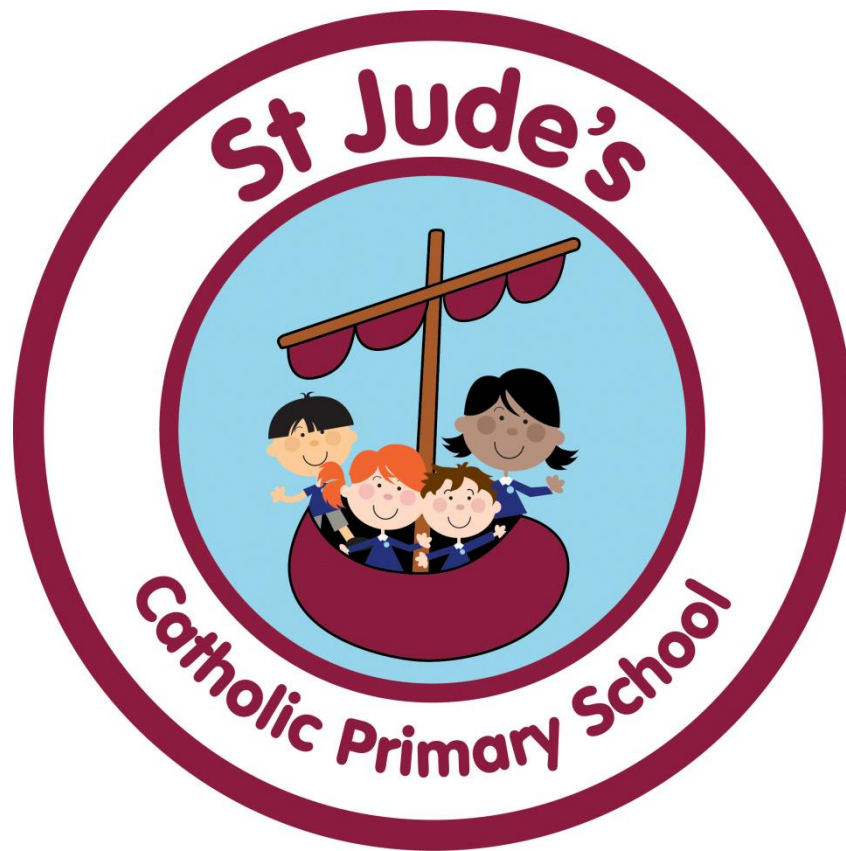


ST JUDE'S CATHOLIC PRIMARY SCHOOL



CCTV Policy

Approved: Summer 2023

To be reviewed: Summer 2025

Together, we learn, love and grow with Jesus

Statement of intent

At St Jude's Catholic Primary School we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use surveillance cameras to monitor any instances of aggression or physical damage to our school and its members.

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

- We comply with the UK GDPR.
- The images that are captured are useable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.

This policy covers the use of surveillance and 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

Legal framework

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

- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act 2012
- The UK General Data Protection Regulation
- Data Protection Act 2018
- 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
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010

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

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'

CCTV Protocol

Owner Operator Data and Controller of the Scheme –Mr D Wilson,
Headteacher

St Jude's Catholic Primary School ("St Jude's") considers a CCTV Scheme can contribute to security and the health and safety of students, staff and visitors and the local community.

The purposes of the CCTV Scheme in St Jude's also provides monitoring systems to assist with the protection of the public property, community

safety, thereby improving the quality of life for the public in general.

CCTV systems in St Jude's have been notified to the Information Commissioner, Registration Number: **Z5538409**

The general management of the school CCTV is currently vested with the School Business Manager and Headteacher.

The day to day management of the CCTV system will be the responsibility of the School Business Manager and School Administrator.

Siting of the Cameras

The Governing Body has considered the proper location of CCTV cameras, where they exist, in and around St Jude's. The location of additional cameras is based upon a variety of information including security and health and safety.

Standards

All such CCTV equipment installed in St Jude's will only be sited in such a way that it only monitors those spaces that are intended to be covered by the equipment.

CCTV will not purposely overlook neighbouring properties, but some properties might be visible or partially visible in the background.

The employees and students will be made aware of the purpose(s) for which the scheme has been established and this is set out within the school's student privacy notice, parent privacy notice and workforce privacy notice.

The operators of the CCTV system will only use the equipment in order to achieve the purpose(s) for which it has been installed.

Currently we have no adjustable cameras but if cameras are ever replaced with such equipment then operators will not be adjusted or manipulate them to overlook spaces which are not intended to be covered by the scheme, other than as described in 6 below.

If it is not possible physically to restrict the equipment to avoid recording images from those spaces not intended to be covered by the scheme, then operators will be trained in recognising the privacy implications of such spaces being covered.

Signs, of no less than the minimum standard will be placed so that the public are aware that they are entering a zone that is covered by CCTV.

The signs should be clearly visible and legible to members of the public. The size of signs will vary according to circumstances.

The signs should contain the following information:

- a. Identity of the person or organisation responsible for the scheme;*
- b. The purposes of the scheme;*
- c. Details of whom to contact regarding the scheme;*
- d. Any other information that may become a statutory requirement.*

Quality of Images Standards

Upon installation an initial check will be undertaken to ensure that the equipment performs properly.

Regular checks will be made thereafter to ensure that the system is operating properly.

Images are retained on a hard disc drive for a period of 14 days. Copies can be made for investigation purposes.

Checks will be made to ensure the accuracy of any features such as the location of the camera and/or date and time reference. Where the time/date etc. are found to be out of sync with the current time/date, the operators will take such remedial action as is continued in the operations manual to correct the error. A note of such changes will be recorded in the daily occurrence log.

Cameras will only be situated so that they will capture images relevant to the purpose for which the scheme has been established.

When installing cameras, consideration must be given to the physical conditions in which the cameras are located.

Cameras are to be properly maintained and serviced to ensure that clear images are recorded. Servicing will be carried out at least annually.

Cameras should be protected from vandalism in order to ensure that they remain in working order. A maintenance log will be kept in the monitoring centre of the system concerned.

The School Business Manager will be:

- a) The person responsible for making arrangements for ensuring that a damaged camera is fixed;*
- b) Ensuring that the camera is fixed within a specific time period;*

- c) Monitoring the quality of the maintenance work.*

Processing the Images Standards

Images should not be retained for longer than is necessary and unless required for specific investigation or evidential purposes, deleted after 14 days have passed.

Once the retention period has expired, the images should be removed or erased.

Images that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.

Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed or be capable of being viewed by anyone other than authorised persons.

Access to the recorded images should be restricted to a manager or designated member of staff who will decide whether to allow requests for access.

Viewing of the recorded images should take place in a restricted area, for example, in a manager's or designated member of staff's office, other employees should not be allowed to have access to that area when a viewing is taking place.

Removal of the medium on which images are recorded, for viewing purposes, should be documented as follows: (Appendix A)

- a) The date and time of removal;*
- b) The name of the person removing the images;*
- c) The name(s) of the person(s) viewing the images;*
- d) The reason for the viewing;*
- e) The outcome, if any, of the viewing;*
- f) The date and time the images were returned to the system or*
- g) Secure place, if they have been retained for evidential purposes.*

All operators and employees with access to images should be aware of the procedure that needs to be followed when accessing the recorded images.

All operators should be trained in their responsibilities under the Code of Practice, i.e. they should be aware of:

- a) The user's security policy e.g. procedures to have access to*

- b) *recorded images;*
- c) *The user's disclosure policy*

Access to and disclosure of images to third parties Standards

All employees should be aware of the restrictions set out in this code or practice in relation to access to, and disclosure of, recorded images. Access to recorded images will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.

All access to the medium on which the images are recorded should be documented.

Disclosure of the recorded images to third parties should only be made in limited and prescribed circumstances. Subject to paragraph 1 above, in disclosure will be limited to the following classes of persons/agencies:

- *Law enforcement agencies, where the images recorded would assist in a specific enquiry;*
- *Highways authorities in respect of traffic management matters;*
- *Prosecution Agencies;*

All requests for access or for disclosure should be recorded, if access or disclosure is denied, the reason should be documented.

If access to or disclosure of the images is allowed, then the following will be documented. (Appendix B)

- *The date and time at which access was allowed or the date on which disclosure was made;*
- *The identification of any third party who was allowed access or to whom disclosure was made;*
- *The reason for allowing access or disclosure;*
- *Location of the images*
- *Any crime incident number to which images may be relevant*
- *Signature of person authorised to collect the medium – where appropriate.*

Recorded images will not be made more widely available – for example they should not be routinely made available to the media or placed on the Internet.

Access by data subjects Standards

In accordance with GDPR (Subject Access Request), an individual who believes that their image has been captured by this scheme is entitled to make a written request to the Data Controller. Upon request, and the supply of essential information, a systems search will be conducted and subject to certain conditions, the individual will be allowed access to the personal data held.

All subject access requests should be referred in the first instance to the Head teacher.

All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects and how such requests are to be dealt with.

Data subjects should be provided with a standard subject access request form, a copy of this form is attached at appendix C, which:

- a) Indicates the information required in order to locate the images requested;*
- b) Indicates the information required in order to identify the person making the request;*
- c) Indicates the fee that will be charged for carrying out the search for the images requested.*

NB. The above form will also enquire whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 30 days of receiving.

Individuals, at the time of any subject access request, will be given a description of the type of images recorded and retained and the purpose for which the recording and retention takes place. They should be informed of their rights as provided by the GDPR.

Prior to any authorised disclosure, the Head teacher will need to determine whether the images of another "third party" individual features in the personal data being applied for and whether these third party images are held under a duty of confidence.

If third party images are not to be disclosed the Network Manager shall arrange for the third party images to be disguised or blurred.

If the Head teacher decides that a subject access request from an individual is not to be complied with, the following should be documented:

- a. *The identity of the individual making the request;*
- b. *The date of the request;*
- c. *The reason for refusing to supply the images requested;*
- d. *The name and signature of the person making the decision.*

Other rights

Under the Data Protection Act individuals also have the following rights which may be applicable to CCTV schemes:

- *Right to prevent processing likely to cause damage or distress;*
- *Rights in relation to automated decision taking;*
- *Right to seek compensation for failure to comply with certain requirements.*

Where a request is made in relation to other rights, these shall be referred to the Head teacher who will document the request and respond to it.

Monitoring compliance with this code of practice Standards

The contact point indicated on the sign should be available to members of the public during normal office hours.

Enquirers should be provided on request with one or more of the following:

- a) *A copy of this code of practice;*
- b) *A subject access request form if required or requested;*
- c) *Appendix C*
- d) *The Complaints Procedure to be following if they have concerns about the use of the system.*

- The School Business Manager should undertake regular reviews of the documented procedures to ensure that the provisions of the Code are being complied with.
- An internal annual assessment should be undertaken which evaluates the effectiveness of the system.
- De-personalised details of complaints will be maintained and will be included in an annual report on each CCTV system.
- A copy of the Complaints Procedure is available on the school website or from the school office.

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RECORDING OF VIEWING BY AUTHORISED SCHOOL STAFF

Date and Time of Image(s) viewed

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Name of Person(s) and Designation(s) of persons viewing the image

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.....

Reason(s) for the Viewing:

Outcome, if any, of the viewing:

RECORDING OF VIEWING BY THIRD PARTY (e.g. Police)

Date and Time Access Allowed

.....

Date, Time and Camera Location of Image(s) viewed

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Name of Third Party, representatives name(s) and designation(s)

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.....

.....

Identification of any third party who was allowed access

.....

Names of school staff present

.....

Reason for allowing access

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.....

Crime incident number if applicable

.....

Date and time of copies created for evidential purposes

Camera No.	Date of Recording	Time From	Time To

If recording is copied and removed from the premises, name, designation and signature of the person collecting the recording:-

Name..... Designation

Signature Date and time of collection

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FORM TO REQUEST ACCESS TO CCTV IMAGES

NAME:

ADDRESS:

DATE OF BIRTH:

TELEPHONE NUMBER:

Date image recorded.....

Time image recorded.....

Details of camera location

.....

The Headteacher will consider the request and respond within one month, in accordance with the school's subject access request procedure.