

Saint Norbert's Catholic School

CCTV Policy

Date Adopted: Advent 2018

Date of Review: Advent 2021



ST. NORBERT'S
CATHOLIC PRIMARY SCHOOL

Our Mission Statement

St. Norbert's strives to nurture and develop the whole child through a

Love of God
Love of one another
Love of life itself

Article 12- Every child has the right to say what they think in all matters affecting them, and to have their views taken seriously.

This policy should be read with reference to the Data Protection Act 2018, the Protection of Freedoms Act 2012 and the CCTV code of practice 2018/GDPR from the Information commissioner's Office (ICO) available at.

http://www.ico.gov.uk/for_organisations/data_protection/topic_guides/cctv.aspx.

This policy should also be read in conjunction with the CEFM Data protection policy and the Site security policy, Education Update May 2012 - Behaviour and discipline in schools and Education Update December 2012 - Data protection, and Do you know?: Use of CCTV in school (March 2013).

Background

Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act and the Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act/GDPR. The use of CCTV by schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is and schools should adhere to the ICO's code of practice. Prior to installation and operation of CCTV schools should issue a privacy notice to parents and pupils. They must be clear and transparent in informing pupils and staff that CCTV will be in operation and about how they will use any personal information they collect. Access to personal information should be restricted only to persons (staff and governors) who need particular information to do their jobs, and only when they need it. Where schools wish to use CCTV images in order to make a decision as to whether to conduct a search for an item, this is allowed under the Education Act 2011. However, staff should follow the ICO's CCTV code of practice.

The school uses CCTV equipment to provide a safer, more secure environment for pupils and staff and to prevent bullying, vandalism and theft. This policy covers the use of CCTV to monitor areas of the school's premises in order to:

- ✓ to protect the school buildings and assets
- ✓ to increase personal safety of staff, pupils and visitors
- ✓ to reduce the fear of crime
- ✓ to support the Police in order to deter and detect crime
- ✓ to protect members of the public and private property

Responsibilities

The Governors delegate the responsibility for the day to day use of the CCTV system to the Headteacher.

The Headteacher and Caretaker are responsible for monitoring and viewing recordings on the system for any out of hours' activities and possible concerns.

The office staff monitor the live feed in the reception office, when appropriate.

Maintenance

The CCTV system is maintained by Ark under an annual maintenance contract that includes periodic inspections.

The contractors are responsible for:

- ✓ Ensuring the school complies with its responsibilities in relation to guidance on the location of the camera.
- ✓ Ensuring the date and time reference are accurate.
- ✓ Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- ✓ Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order.

Use of the System

- ✓ The equipment is sited in such a way that it only monitors those spaces that are intended to be covered and the cameras are located to limit visibility from unauthorised persons.
- ✓ Operators are aware of the purposes for which the system was installed and that they are only able to use the system in order to achieve those purposes.
- ✓ Clearly visible and legible signs are displayed to inform the public that they are entering an area where their images are being recorded.
- ✓ All data is kept on computer (with limited access)

Image storage, viewing and retention

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator unless the monitor displays a scene which is in plain sight from the monitored location. Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of pupils, staff or visitors unless the camera(s) are installed to monitor the safe movement of persons through a designated area eg corridors (these areas will be identifiable by clear signs). The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

Neither the Data Protection Act nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The school ensures that images are not retained for longer than is necessary. Once the retention period has expired, the images are removed or erased.

Disclosure

Disclosure of the recorded images to third parties can only be authorised by the data controller. Disclosure will only be granted:

- ✓ If its release is fair to the individuals concerned.
- ✓ If there is an overriding legal obligation (eg information access rights).
- ✓ If it is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented. NB: Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

Subject access requests

Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If the school receives a request under the Data Protection Act it will comply with requests within 40 calendar days of receiving the request. The school may charge a fee for the provision of a copy of the images. If the school receives a request under the Freedom of Information Act it will comply with requests within 20 working days of receiving the request. As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request. Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system. Requests for access should be addressed to the Headteacher. Refusal to disclose images may be appropriate where its release is:

- ✓ Likely to cause substantial and unwarranted damage to that individual.
- ✓ To prevent automated decisions from being taken in relation to that individual.

Monitoring of Policy

The implementation of this policy will be monitored by the Local Governing Board.

Signed _____

(Headteacher)

Signed _____

(for and on behalf of the Local Governing Board)

Date _____