

ST MARY'S PRIMARY SCHOOL MAGHERY



CCTV Policy

Version	Date	Revision Author	Summary of Changes

CCTV Policy

At St Mary's Primary School, we believe privacy is important. We are committed to complying with our data protection obligations and to being concise, clear and transparent about how we obtain and use Personal Information and how (and when) we delete that information once it is no longer required.

This Policy is intended to reflect the school's implementation of CCTV through following best practice advice from the Information Commissioner's Office (ICO). We will review and update this CCTV Policy regularly in accordance with our data protection obligations.

Any queries in relation to this Policy or any of the matters referred to in it should be submitted to the Principal Miss R Robinson.

The following policies, procedures and documents are also relevant to this Policy:

- School Data Protection Policy and Privacy Notice
- Department of Education Model Disposal of Records Schedule for Schools

All policies can be found on our website www.stmaryspsmaghery.co.uk

Introduction

St Mary's Primary School has in place CCTV surveillance. We use CCTV cameras to view and record individuals on and around our premises in order to maintain a safe environment for our pupils, staff and visitors. However, we recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with Data Protection Act 2018 and the UK GDPR.

CCTV systems are installed on the school premises, therefore this Policy applies to teaching staff, non-teaching staff, volunteers, pupils, parents/carers, contractors and other visitors to the school, including members of the public.

The purpose of this Policy is to:

- a) set out why and how we will use CCTV, and how we will process data recorded by CCTV cameras
- b) ensure that the legal rights of data subjects, relating to their personal data, are recognized and respected
- c) assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence
- d) explain how to make a subject access request in respect of personal data created by CCTV.

Purpose of CCTV

The School has identified a need for CCTV externally. We have outlined below the reason we use CCTV around our site:

To protect property: The presence of CCTV is intended to reduce crime.

Provide assistance in the detection of crime: in the event that any criminal incidents of any kind do occur, to provide high quality evidence which may assist in identifying individuals involved and where appropriate detecting crime and apprehension and prosecution of offenders.

To improve and provide assistance with issues relating to the health and safety of pupils, staff, and visitors: it is intended that in the event of any incident which may raise health and Safety concerns, which CCTV may assist in determining the cause of the incident and may measures which need to be taken as a result of incidents.

To assist in child protection by deterring inappropriate behavior and providing assurances to staff, volunteers and parents that evidence from CCTV may be available should the need arise to investigate an alleged or actual Child Protection incident.

This list is not exhaustive and other purposes may be or become relevant.

Who is Responsible for this Policy

For the purpose of the Data Protection Act 2018 and the UK GDPR, the School is the Data Controller of the CCTV surveillance system. The School's ICO Registration number is: Z8729532.

The School Board of Governors and Principal have overall responsibility for the effective operation of this policy. The Principal is the primary contact for the day-to-day application of this policy therefore any questions in relation to this policy should be referred to the Principal in the first instance.

This Policy will be reviewed annually by the School Board of Governors and Principal, who may also consult with the School's DPO, if appropriate. The School will also review the ongoing use of existing CCTV cameras in the School, annually, to ensure that their use remains necessary and appropriate, and that any surveillance system is continuing to address the needs that justified its introduction in line with all relevant ICO guidance and seek to comply with its best practice suggestions.

Any and all future changes to CCTV systems or the addition of CCTV systems (or other surveillance systems) will be subject to the completion of a satisfactory Data Protection Impact Assessment (DPIA).

CCTV System Overview

The School's CCTV system is capable of recording 24 hour 7 days per week. Images will be recorded and retained on a 30 day rolling period, unless the School is required by law to retain them and/or it is necessary for the school to retain any footage as part of the investigation of an incident. In the case of the latter the relevant footage will be stored

securely until it is no longer required for the purpose for which it was retained. Otherwise, the CCTV System will automatically delete the images it records after 30 days.

The CCTV system monitor is situated in Principal's office.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring.

CCTV will not cover external public areas other than paths and roads immediately beside the school premises, which will be limited to the degree possible by positioning and technical controls.

CCTV operating staff will be limited to a small number of individuals appointed by the Board of Governors, who will be required to be conversant with the School's CCTV Policy and Data Protection Policy when appointed. CCTV Operating Staff will also be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure the Network based CCTV recorder on premises will be operated in a locked room with restricted access, and with password protection on the system to limit access to only approved personnel.

In order to inform people that they are under surveillance we will display clear CCTV signage appropriately around the School premises in the locations wherein CCTV cameras have been positioned. The signage will be easy to read, well-lit and positioned in places where they can be easily seen by individuals.

The School CCTV systems audio recording will be disabled as this is may be considered intrusive and unnecessary in most circumstances and could thereby undermine support and confidence. Nor do the School CCTV systems have the ability for facial recognition.

Requests for Disclosure

To Individuals and Third Parties

Any request for images by an individual data subject which relate to themselves or a third party acting on their behalf, i.e. "*Subject Access Requests*" should be made directly to the School, marked for the attention of the School Principal. Such requests will be processed in line with Data Protection Legislation. Identification and/or a sufficient 'form of authority' will be sought by the school upon receipt of such a request.

In order for the school to locate the relevant images sufficient detail should be provided by the requester, such as date/location and time.

Where images include third parties, the school may not be in a position to release the image/footage where doing so would place them in breach of Data Protection Legislation.

Requests will be processed on a case by case basis and the 'right of access' granted when appropriate

CCTV footage will not be routinely shared with external agencies or bodies, whether statutory prosecution agencies, the judicial system, local government agencies, legal representatives, data subjects or other external bodies except upon receipt of a valid request. For example, it may be necessary for us to share recorded footage in limited circumstances such as where a law enforcement agency is investigating a crime. These images may be disclosed via viewing or by providing a copy of the images.

The School will consider all such requests in line with Data Protection Legislation and release images only where a relevant exemption to the Data Protection Legislation applies.

5 Complaints

Any complaint regarding the School's CCTV will be dealt with in line with the School's Complaints Policy.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's contact details are as follows:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01 625 54 57 45/0303 123 1113, website: www.ico.org.uk

6. Monitoring and Evaluation of the Policy

The Board of Governors will ensure that this CCTV Policy is reviewed annually and revised as necessary in the light of changes in circumstances and/or legislative requirements.

Discussed and agreed by staff:

Reviewed by BOG:.....

Ratified by BOG:.....

Signed: Mr Jimmy McKee (Chair of the BOG)

Signed: Miss Rita Robinson (School Principal of St Mary's Maghery)
