



St Michael's C of E VA Primary School

As a Church School we seek to ensure that the ethos and principles of Christianity underpin the experiences of the children in our care.

“St Michael’s is an inclusive school and respects and values the diversity of the Community”.

CCTV Policy

(Adapted from the HfL model policy May 2018)

Approved by the Curriculum Committee:	May 2018
Frequency of Review:	Annually
Next Review Date:	May 2019

INTRODUCTION

Closed Circuit Television Systems (CCTV's) are installed in *St. Michaels' C of E School*. Our CCTV systems are regularly reviewed in consultation with staff and the governing body.

1. PURPOSE OF POLICY

***“The purpose of this policy is to regulate the use of Closed Circuit Television, and its associated technology, in the monitoring of the external environs of the premises under the remit of St. Michael’s C of E VA School.*”**

The School uses CCTV in locations around the School site. This is to:

- protect the School buildings and their assets;
- increase personal safety and reduce the threat of crime;
- support the Police in a bid to deter and detect crime;
- assist in identifying, apprehending and prosecuting offenders;
- protect members of the school community, public and private property; and
- assist in managing the School.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

3. GENERAL PRINCIPLES

St. Michael's C of E VA School has a statutory responsibility for the protection of its property and equipment as well providing a sense of security to its employees, pupils and visitors to its premises. The School uses CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community, by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

Information obtained through the CCTV system may only be released when authorised by the Headteacher.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee or pupil of the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by St. Michael's C of E VA School governing body. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the General Data Protection Regulation, 2018.

4. **JUSTIFICATION FOR USE OF CCTV**

The use of CCTV to monitor the perimeter of the school buildings for security purposes has been deemed to be justified by the board of governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/pupil classroom activity in school.

5. **LOCATION OF CAMERAS**

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. St Michael's C of E VA School has endeavoured to select locations for the installation of CCTV cameras which are the least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas in St. Michael's may include the following:

- ***Protection of school buildings and property:*** The building's perimeter, entrances and exits,
- ***Monitoring of Access Control Systems:*** Monitor and record restricted access areas at entrances to buildings and other areas
- ***Criminal Investigations (carried out by the Police):*** Robbery, burglary and theft surveillance

6. **NOTIFICATION – SIGNAGE**

The Headteacher will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the school. This policy describes the purpose and location of CCTV monitoring. The location of CCTV cameras will also be indicated to the Board of Governors. Adequate signage will be placed at each location in which a CCTV camera is sited to indicate that CCTV is in operation, as allowed by the school's Historical building status.



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, for the safety of our staff and students and for the protection of St Michael's C of E school and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the Police.

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area
- at or close to each internal camera

7. STORAGE & RETENTION

GDPR, 25th May, 2018 act states "data shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member.

Tapes/DVDs will be stored in a secure environment with a log of access to tapes kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

8. ACCESS

Tapes/DVDs storing the recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to tapes/images will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only, ie Headteacher and the Office Manager. In relevant circumstances, CCTV footage may be accessed:

- By the Police where St. Michael's C of E school are required by law to make a report regarding the commission of a suspected crime; or

- Following a request to the Police when a crime or suspected crime has taken place; or
- To the Department of Education and /or any other statutory body charged with child safeguarding; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to the school.
- To individuals (or their legal representatives) subject to a court order.
- To the school's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Requests by the Police: Information obtained through video monitoring will only be released when authorised by the Headteacher, following consultation with the Chair of Governors.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing, according to the Subject Access Request policy

A person should provide all the necessary information to assist the school in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the school.

9. RESPONSIBILITIES

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by St. Michael's C of E V School
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at St. Michael's C of E school is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy.
- Give consideration to both pupils and staff feedback/complaints regarding possible invasion of privacy or confidentiality, due to the location of a particular CCTV camera or associated equipment

- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil)
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas

10. SECURITY COMPANIES

The school CCTV system is controlled by a security company contracted by the school who are governed by our Privacy notices for contractors.

11. IMPLEMENTATION & REVIEW

The policy will be reviewed and evaluated bi-annually.