



Introduction

The school recognises that CCTV systems can be privacy intrusive.

For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

Review of this policy shall be repeated regularly and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

Objectives

The purpose of the CCTV system is to assist the school in reaching these objectives:

- (a) To protect pupils, staff and visitors against harm to their person and/or property.
- (b) To increase a sense of personal safety and reduce the fear of crime.
- (c) To protect the school buildings and assets.
- (d) To support the police in preventing and detecting crime.
- (e) To assist in identifying, apprehending and prosecuting offenders.
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- (g) To assist in managing the school.

Purpose Of This Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school comprises of:

CAMERA no	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
1	CAR PARK	N	Y	F
2	OUTSIDE MAIN RECEPTION	N	Y	F
3	CIRCULATION AREA	N	Y	F
4	TOILET CORRIDOR	N	Y	F
5	RECEPTION DESK	N	Y	F
6	EYFS YARD	N	Y	F
7	JUNIOR PLAYGROUND	N	Y	F
8	JUNIOR PLAYGROUND/FIELD	N	Y	F
9	BOTTOM RIGHT CORRIDOR	N	Y	F
10	BOTTOM LEFT CORRIDOR	N	Y	F
11	Y6 TOILET /CIRCULATION AREA	N	Y	F
12	PATHWAY TO REAR OF SCHOOL	N	Y	F
13	CHILDWALL GATE/ MUSTER AREA	N	Y	F
14	YARD OUTSIDE Y5/6 BLOCK	N	Y	F

Statement Of Intent

Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 9 days.

System Management

Access to the CCTV system and data shall be password protected.

The CCTV system will be administered and managed by Mike Smith(Site Manager) who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by Mr David Delaney (Deputy Headteacher).

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation 24 hours a day throughout the year, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned in paragraph 5.3 above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

Downloading Captured Data Onto Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings any download media used to record events from the hard drive must be prepared in accordance with the following

procedures:

On receipt of a request to download CCTV footage the System Manager will access the Equipment Room and record the fact in the System log register .

The System Manager will then identify from the request form the relevant cameras pertinent to the request and record the details of the retrieval in the System Log Register. Once this has been done the system can be searched to identify the required footage and the Master Copy generated in accordance with the system operating procedures.

The Media to be used to create this copy will either be a CD-R or DVD-R [Write Once Read Many (WORM)] and will be dependent on the volume of data required, the number of cameras, and the time duration of the required footage.

Once the Master Copy has been produced two Working Copies can be produced using the Duplicator Machine.

The Master Copy will then be placed in its box and the box sealed and clearly labelled and identified by a unique mark. i.e.

Ref no MS/1 Master Copy, Camera 1 – car park Christ The King Primary School, L15 7LZ

date of incident & time frame of recording

date & time of copying, date & time of sealing of sealing

Details of by whom. i.e. System Manager (Mike Smith)

The Master Copy will then be stored within the designated separate store.

Working copies will also be sealed, and clearly labelled i.e.

Ref no MS/2 Working copy 1/2, Camera 1 – car park- Car Park. Christ The King Primary School, L15 7LZ date of incident & time frame of recording. Date & time of copying. Date & time of sealing of sealing. Details of by whom. i.e. System Manager (Mike Smith)

Ref no MS/3 Working Copy, 2/2 Camera 1 – car park- Car Park. Christ The King Primary School, L15 7LZ, date of incident & time frame of recording. Date & time of copying. Date & time of sealing of sealing. Details of by whom. i.e. System Manager (Mike Smith)

These should also be stored in the same secure store as the Master Copy.

If download media is archived the reference must be noted in the system log register.

Working Copies may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised senior leaders and any viewing should be recorded in the system log register. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any download media to the police or other authorised applicants. Should images be required as evidence, the Master copy and working copies may be released to the police under the procedures described in this policy. A record of when and whom the material was released to will be recorded in the system log register and the person collecting the material will sign the system log book for continuity of evidence purposes.

Copies of Images will only be released to the police on the clear understanding that the download media (and any images contained thereon) remains the property of the school and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person.

On occasions when a Court requires the release of a downloaded media this will be produced from the secure

evidence store, complete in its sealed bag. A record of when and whom the material was released to will be recorded in the system log register and the person collecting the material will sign the system log book for continuity of evidence purposes.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored as detailed earlier until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer.

Complaints About The Use Of CCTV

Any complaints in relation to the school's CCTV system should be addressed to the Headteacher.

Request For Access By The Data Subject

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to Kate Griffin.

Public Information

Copies of this policy will be available to the public from the school office.

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Date.....