

CCTV Policy

St. Martin's School

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1.0 Introduction

- 1.1 The purpose of this policy is to regulate the management and use of the Closed Circuit Television (CCTV) system at St. Martin's School.
- 1.2 This policy should be read in conjunction with the School's Data Protection Policy. It will seek to comply with the Information Commissioner's Office (ICO) Code of Practice 2015 and the Data Protection Act 1998:-
- 1.3 Data should be:
- Fairly and lawfully processed;
 - Processed for limited purposes and not in any manner incompatible with those purposes;
 - Adequate relevant and not excessive;
 - Accurate;
 - Not kept for longer than is necessary;
 - Processed in accordance with individuals' rights;
 - Secure;
 - Not transferred to countries without adequate protection.

2.0 Objectives of the CCTV

- 2.1 The CCTV System will be used to:-
- Help maintain an environment for pupils, staff and others, which supports their personal safety;
 - Deter against crime – to persons, school buildings and property
 - Assist in the identification and prosecution of persons having committed an offence
- 2.2 The CCTV System will not be used for any covert surveillance.

3.0 Administration

- 3.1 The Headteacher, Mr. Lee Jarvis, on behalf of the school as Data Controller has responsibility for the control of images and deciding how the CCTV system is used.

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- 3.2 The school has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used.
- 3.3 All operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.
- 3.4 All operators are trained in their responsibilities in line with the Code of Practice 2015 and a training log will be maintained by the Headteacher as Data Controller.
- 3.5 Access to recorded images is restricted to staff that need to have access in order to achieve the purpose of using the equipment.
- 3.6 All access to the medium on which the images are recorded is documented (Appendix 1).
- 3.7 All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

4.0 Location of CCTV Equipment

- 4.1 The cameras are located within communal areas, ICT rooms, classrooms, finance office, reception, nurture/family rooms and outdoor spaces.
- 4.2 Cameras that are adjustable by the operators will not be adjusted or manipulated so as to overlook spaces which are not intended to be covered by the scheme. Filming outside the school boundaries will not occur.
- 4.3 In areas where CCTV is used the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area. The signs will:
- Be clearly visible and readable
 - Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme
 - Be an appropriate size depending on context

5.0 Maintenance

- 5.1 The CCTV system is maintained by Axis under an annual maintenance contract.
- 5.2 The school's DCF Technician, Mr. Ryland Evans, will be the person responsible for:-

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- Weekly operational checks of the system are made and a log will be kept (Appendix 2)
- Ensuring that the date and time reference are accurate
- Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order
- Ensuring that a damaged camera is fixed
- Ensuring that a damaged camera is fixed within a specific time period
- An annual check of the system will be carried out and recorded (Appendix 3)

The above actions will be undertaken under the supervision of the Headteacher.

6.0 Storage, Viewing and Retention

- 6.1 Images will be stored for a period of 30 days unless an incident arises which requires longer retention in line with the specified purposes of the CCTV system.
- 6.2 Once the retention period has expired, the images will be erased.
- 6.3 Images that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.
- 6.4 Access to recorded images will be restricted to the Headteacher, Mr. Lee Jarvis, on behalf of the school as Data Controller.
- 6.5 Viewing of the recorded images will take place in a restricted area. Other employees will not have access to this area when a viewing is taking place.
- 6.6 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and other service providers to the school where these would reasonably require access to the data (e.g. Local Authority Health and Safety personnel) only for the purposes as stated in Section 2 of this policy.

7.0 Complaints

- 7.1 Any complaints about the school's CCTV system should be made in line with the school's complaints policy initially in writing to the Headteacher.

8.0 Subject Access Requests

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- 8.1 The Data Protection Act provides Data Subjects with a right to access data held about them including images obtained by CCTV.
- 8.2 Requests for images should be made in writing to the Headteacher as a Subject Access Request. Each request will be given individual consideration and will be subject to a charge of £10.
- 9.0 **Public Information**
Copies of this policy will be available upon request from the school office and on the school website at www.stmartins.caerphilly.sch.uk

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Appendix 1

Viewing of Recorded Images Log

Date	
Time	
Name/s of Person/s viewing the images	
Reason for the viewing	
Outcome (if any) of the viewing	
Any other relevant information to be noted	

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Appendix 2

Weekly Operational Checks Log

Date	Time	Name of person carrying out checks	Correct date and time check	Vandalism Check	Clear image check	Any issues detected	Action to be taken	To be completed by	Completed

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	Checked (Date)	By	Date of next review
Notification has been submitted to the information unit, and renewal date recorded			
There is a named individual who is responsible for the operation of the system			
A system has been chosen which produces clear images which the law enforcement bodies (Police) can use to investigate crime and these can easily be taken from the system when required			
Cameras have been sited so that they provide clear images			
Cameras have been sited so they provide clear images			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises			
There are visible signs showing that CCTV is in operation. The purpose of the system and relevant contact details are displayed on the signs			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them			
The recorded images will only be retained long enough for any incident to come to light (e.g.: theft to be noticed etc.) and the incident investigated			
There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and other service providers to the school where these would reasonably require access to the data (e.g. Local Authority Health and Safety personnel).			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made A greener place Man gwyrddach			

Regular checks are carried out to ensure that the system is working properly and produces high quality images			
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Privacy Impact Assessment

This form should be completed by the Headteacher as Data Controller on behalf of the School and should be reviewed in accordance with the CCTV Policy and the Information Commissioner's Office (ICO) Code of Practice 2015.

For what purpose(s) will the CCTV be used?	
What are the benefits to be gained from its use?	
Can less intrusive solutions (e.g. improved lighting) achieve the same objectives?	
Will the particular equipment/system being considered deliver the desired benefits now and remain suitable in the future?	
What (if any) future demands may arise for wider use of the images and how will you address these?	
What are the views of those individuals (if any) who will be under surveillance?	

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What could you do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed?	
Is appropriate signage informing individuals of the camera in place (if required)?	
Proposed time period for installation of the CCTV	
Is the proposed system in accordance with the law?	
Is it necessary to address a pressing need, such as public safety or crime prevention?	
Is it justified in the circumstances?	
Is it proportionate to the problem that it is designed to deal with?	
Signed (Headteacher)	
Date	