



*St Paul's
C of E
Primary School and Nursery*

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CCTV Policy

Date Issued: April 2023

Signed: Chair of Governors

Signed: Headteacher

Next Review by: April 2024

1 Policy Statement

The purpose of this policy is to set out the management, operation and use of the Close Circuit Television (CCTV) at St Paul's Church of England Primary School

2 Introduction

St Paul's Primary School uses CCTV images to reduce the threat of crime generally, protecting our premises and helping to ensure the safety of all of our staff, pupils and visitors consistent with respect for the individuals' privacy.

The system comprises a number of fixed and dome cameras located externally to provide coverage of the gates, outside play facilities and car parks.

This policy takes account of all applicable legislation and guidance, including:

- UK General Data Protection Regulation ("GDPR")
- Data Protection Act 2018
- Human Rights Act 1998
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998
- Surveillance Commissioner Code of Practice
- The Equality Act 2010

3 Scope

This policy applies to all staff, governors, contractors, agents, volunteers, representatives and temporary staff, working for or on behalf of the School. The requirements of this policy are mandatory for all of these parties.

4 Purpose of CCTV

St Paul's C of E Primary School uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors
- To prevent the loss of or damage to the St Paul's C of E Primary School buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

5 Siting of Cameras

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. St Paul's C of E Primary School will make all reasonable efforts to ensure that areas outside of St Paul's C of E Primary School premises are not recorded.

Signs will be placed in prominent positions to inform individuals that they are in an area within which CCTV is in operation.

6 Privacy Impact Assessment

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted to ensure that the proposed installation is compliant with legislation and ICO guidance.

7 Management and Access

The CCTV system will be managed by Cheryl Griffiths, School Business Manager.

Access to the system will be restricted to approved members of the leadership team as required to fulfil the duties of the school. Requests for stored footage will be made to them for consideration before approval.

The CCTV system is checked quarterly by Paul Allinson, Site Manager, to ensure that it is operating effectively.

8 Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of 30 days unless there is a specific purpose for which they are retained for a longer period.

St Paul's C of E Primary School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to specified members of staff;
- A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by St Paul's C of E Primary School (please see Appendix A)

9 Disclosure of Images to Data Subjects

According to UK GDPR and DPA 2018, individuals have the right to request a copy of any CCTV footage of themselves. Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation.

Any individual who requests access to images of themselves will be considered to have made a (SAR) subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the St Paul's C of E Primary School Data Protection Policy.

When such a request is made the School Business Manager will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. St Paul's C of E Primary School must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then St Paul's C of E Primary School must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by the School Business Manager in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

On occasions, the school will reserve the right to refuse a SAR, if for example, the release of the footage to the subject would prejudice an ongoing investigation.

10 Disclosure of Images to Third Parties

St Paul's C of E Primary School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then St Paul's C of E Primary School must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

11 Review of CCTV Policy

This policy will be reviewed annually.

12 Misuse of CCTV systems / Policy Breach

The misuse of CCTV system could constitute a criminal offence.

Any breach of the Code of Practice by school staff or other person who is bound by this policy will be initially investigated by the Headteacher/Chair of Governors, in order for him/her to take the appropriate disciplinary action. Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

13 Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by St Paul's C of E Primary School should be made in accordance with the school's Complaints Policy.



CCTV ACCESS LOG

Date of Access	Name of Persons Accessing Images	Date and time of images being viewed	Reason for Access