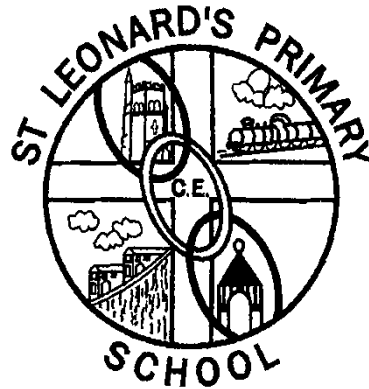


SCHOOL CLOSED CIRCUIT TELEVISION (CCTV) STATEMENT

St Leonard's CE Primary School



1. Introduction

1.1 The purpose of this Policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at St Leonard's CE Primary School. CCTV is in use to:

- increase personal safety of students, staff and visitors, and reduce the fear of crime
- monitor and minimise unauthorised and inappropriate vehicle access
- assist in managing the school
- protect the school buildings and their assets
- support the Police in a bid to deter and detect crime
- assist in identifying, apprehending and prosecuting offenders
- protect members of the public and private property

1.2 The system comprises of a number of fixed cameras.

1.3 The system does not have sound recording enabled.

1.4 The CCTV system is part of the electronic infrastructure of the building and is operated by the school and the deployment of which is determined by the school's leadership team.

1.5 The CCTV is accessible only by certain key staff with responsibility for security or behaviour.

1.6 Any changes in CCTV monitoring will be subject to consultation with staff and the school community.

1.7 The school's CCTV Scheme is covered by its registration with the Information Commissioner under the terms of the UK Data Protection Act 2018/UK GDPR and ICO CCTV Code of Practice. The use of CCTV, and the associated images and any sound recordings, is covered by the UK Data Protection Act 2018/UK GDPR. This policy outlines the school's use of CCTV and how it complies with the Act.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the school data controller in their responsibilities under the relevant legislation/code of practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.9 The school, as data controller, has responsibility for the control of images and deciding how the CCTV system is used.

2. Statement of Intent

2.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

2.2 CCTV warning signs are prominently placed in external places close to school entrances

2.3 The planning and design has endeavoured to ensure that the Scheme 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.

3. Siting the Cameras

3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

3.2 The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

3.3 CCTV is not used in classrooms. Cameras are positioned on external buildings and security gates only.

3.4 Members of staff have access to details of where CCTV cameras are situated.

5. Storage and Retention of CCTV images

5.1 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. The schools retains CCTV for a period of up to 21 days.

5.2 All retained data will be stored securely.

6. Access to CCTV images

6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7. Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves/their children under the Data Protection Act.

7.2 All requests should be made in writing to the data controller. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

7.3 The school will respond to requests within 30 calendar days of receiving the written request.

7.4 The school will ensure that the requester/requesters children are present in the footage and that by supplying the footage they do not disclose any personal data of another data subject.

7.5 As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and the images pixelated so that only the person requesting access can be identified. The school has software that enables images to be pixelated, but if it is not possible to conceal the identity of others, disclosure is unlikely. Refusal to disclose images, even if pixelated, may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to an individual.
- To prevent automated decisions from being taken in relation to an individual.
- Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

8. Access to and Disclosure of Images to Third Parties

8.1 There will be no disclosure of recorded data to third parties other than where the school is legally required/permitted to do so by law.

8.2 Requests for access from third parties should be made in writing to the school.

9. Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the headteacher at the school.

9.2 If the issue remains unresolved, complainants should contact the Trust's Data Protection Officer using the school address or via email at: IG@telford.gov.uk

9.3 If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioners Office, they are advised to contact the Information Commissioners Office via www.ico.org.uk.

Further Information

- Further information on CCTV and its use is available from the following:
- CCTV Code of Practice (published by the Information Commissioners Office)
www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- UK Data Protection Act 2018/UK GDPR

Appendix A – CCTV Signage

It is a requirement of the UK Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

Images are being monitored for the purpose of crime detection, prevention and increase personal safety of students, staff and visitors, and reduce the fear of crime

The scheme is controlled by St Leonard's CE Primary School
For further information please contact

admin@stleonardsprimary.co.uk

Phone: 01746 762 781