Date Approved:	Oct 2019
Date of Next Review:	Oct 2021
Designated SLT:	DFE
<b>Governors' Committee:</b>	Premises



# **CCTV Policy & Code of Practice**

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#### **School Vision and Mission Statement**

The community of St Mark's believes that every individual is created by God and is precious to God. Each person is called to serve God and their neighbour and to fulfil their potential.

St Mark's is a Catholic School which has at its heart a love of God, the education of its students and a mission to serve our neighbours and community. We seek to foster a spirit of truth, reconciliation, justice and peace. We are committed to developing the spiritual, intellectual, moral, cultural, social and physical potential of all our members within a safe and supportive environment.

# 1. Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Mark's Catholic School.

The system comprises a number of IP cameras located in and around the school building. All cameras are monitored under restricted access from nominated staff personal desktops. Staff will only view footage in an office privately and will not disclose any contents. All findings and recordings are to be sent to the Headteacher or Safeguarding Deputy Headteacher to issue data, discuss or follow up. Names of authorised staff with access to the CCTV data will be listed at the end of this policy.

This Code follows Data Protection Act guidelines. The Code of Practice will be subject to review bi-annually to include consultation as appropriate with interested parties.

The CCTV system is owned by the school.

### 2. Objectives of the CCTV scheme

- To increase personal safety of staff, students and visitors and reduce the fear of crime
- To protect the school buildings and their assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders

• To protect members of the public and private property

# 3. Statement of intent

The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

Cameras will be used to monitor activities within the school grounds, its car park and in the vicinity of the access gates to identify adverse activity occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of the school's students and staff, together with its visitors. Staff have been instructed that static cameras are not to focus on 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. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Recordings will never be released to the media for purposes of entertainment. 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.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

### 4. Operation of the system

The CCTV system will be administered and managed by the school in accordance with the values and objectives expressed in the code. The day to day management will be the delegated responsibility of the Headteacher during the day, and the site staff out of hours and at weekends. Viewing of recorded images must take place in restricted area with controlled access. The CCTV system will be operated 24 hours each day, every day of the year, recording all activity. All operators and others with access to images must be aware of the access procedures that are in place.

### 5. Control and Liaison

A member of the Network Staff will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional. The school will liaise with "Intellisource" regarding servicing and/or repairs of the system.

# 7. Monitoring procedures

Camera surveillance may be maintained at all times and footage continuously recorded and held on system memory.

#### 8. Image storage procedures

- All data will be "cloud" stored and will not be stored on the School or person network systems.
- If the disc is archived the reference must be noted.
- Data may be viewed by the Police for the prevention and detection of crime. A
  record will be maintained of the release of discs to the Police or other
  authorised applicants. A register will be available for this purpose. Viewing of
  data by the Police or any external individual must be recorded in writing and
  entered in the register. Requests by the Police can only be authorised under
  section 29 of the Data Protection Act 2018.
- Applications received from outside bodies (e.g. solicitors) to view or release data will be referred to the
- Headteacher. In these circumstances data will normally be released where
  satisfactory documentary evidence is produced showing that they are required
  for legal proceedings, a subject access request, or in response to a Court
  Order. This must be provided within 40 calendar days of receiving the
  required fee and the request. A fee of £20 may be charged in such
  circumstances (a receipt will be provided). If the decision is taken not to
  release the images, then the image in question should be held and not
  destroyed until all legal avenues have been exhausted.

### 9. Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for the Headteacher to take the appropriate disciplinary action. Complaints will be dealt with in accordance with the ICO Code of Practice.

# 10. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by a nominated member of the Network staff.

# 11. Complaints

Any complaints about the school's CCTV system should be addressed to Mr I. Wilkinson, Assistant Headteacher. Complaints will be investigated in accordance with the ICO Code of Practice.

### 12. Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Data Subject Access Requests should be made in writing to Mr I Wilkinson, Assistant Headteacher. The request should provide as much information as possible

to enable the school to find the images including date, time and location. If the Data Subject is unknown to the school then a photograph of the individual and/or a description of what they were wearing at the time they believe they were caught on the system may be requested in order to aid identification.

# 13. Public information

**Summary of Key Points** 

Copies of this Code of Practice will be available to the public from the School website.

<ul> <li>□ This Code of Practice will be reviewed every two years.</li> <li>□ The CCTV system is owned and operated by the school.</li> <li>□ Liaison meetings may be held with the Police and other bodies.</li> <li>□ Data may only be viewed by Authorised School Officers and the Police.</li> <li>□ Data required as evidence will be properly recorded witnessed and package before copies are released to the police.</li> <li>□ Data will not be made available to the media for commercial or entertainmen</li> <li>□ Any breaches of this code will be investigated by Mr I Wilkinson, Assistant Headteacher. An independent investigation will be carried out for serious breaches of the code and remedies will be reported to the Headteacher.</li> </ul>	t.
Approved by Governing Body: (Chair): Margaret McMichael (agreed meeting 09/10/19)	
Authorised Staff to access CCTV data:  Ms A Waugh – Lucas - Headteacher  Mr M Longuehaye – Pastoral Deputy Headteacher  Mrs D Fear – Finance & Resources Director  Mrs J Forde – Student Services  Mr D Emil – Network Manager  Mr G Fernandes – Assistant to Network Manager  Mrs M Boyce – Premises Co-Ordinator  Mr C Kisby – Senior Caretaker  Mr S Collins – Caretaker  Mrs J Murray – Receptionist (Reception, real time access only)	
Above Staff sign to state that this policy had be read and understood and will be adhered to:	е
Date:	