

CCTV Policy

1 Policy Statement

1.1 St. Margaret Clitherow, uses Close Circuit Television ("CCTV") within the premises of the School. The purpose of this policy is to set out the position of the school as to the management, operation and use of the CCTV.

1.2 This policy applies to all members of our Workforce, visitors to the School premises and all other persons whose images may be captured by the CCTV system.

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

1.3.1 General Data Protection Regulation ("GDPR")

1.3.2 *Data Protection Act 2018* (together the Data Protection Legislation)

1.3.3 CCTV Code of Practice produced by the Information Commissioner

1.3.4 Human Rights Act 1998

1.4 This policy sets out the position of the School in relation to its use of CCTV.

2 Purpose of CCTV

2.1 The School uses CCTV for the following purposes:

2.1.1 To provide a safe, secure and non-threatening environment for pupils, staff and visitors

2.1.2 To prevent the loss of or damage to the School buildings and/or assets

2.1.3 To assist in the detection or prevention of crime and assist law enforcement agencies in apprehending offenders

3 Description of system

3.1 The CCTV system consists of 14 number Hik Vision IP cameras, in fixed positions around the School site and have sounder have sound recording capabilities. The mic is on the Front Lobby Reception CCD only.

16 Channel NVR with 2TB of Hard Drive (Existing).

All cameras cover vulnerable areas of the school and its grounds and are positioned to avoid areas that do not require CCTV coverage. A4 "CCTV IN USE" Signs indicating that the School has a CCTV system are located near the main entrance and perimeter gates (Front & Side).

4 Siting of Cameras

4.1 All CCTV cameras are 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.

4.2 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. The School will make all reasonable efforts to ensure that areas outside of the School ground premises are not recorded.

4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

4.4 Cameras will not be sited in areas where individual have a heightened expectation of privacy, such toilets.

5 Privacy Impact Assessment

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

5.2 The School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

6.1 The CCTV system will be managed by the School and support/service will be given Eagle Security.

6.2 On a day-to-day basis the CCTV system will be operated by the Authorised staff under the supervision of the Head.

6.3 The viewing of live CCTV images will be restricted to members of the Senior Leadership Team (SLT), Caretaker and Admin Staff.

6.4 Recorded images and audio which are stored by the CCTV system will be restricted to access by Authorised staff under the supervision of the Head.

6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

6.6 The CCTV system is checked daily by the site staff to ensure that it is operating effectively

7 Storage and Retention of Images

7.1 Any images recorded by the CCTV system will be retained only for as long as necessary (for a maximum of 10 days) for the purpose for which they were originally recorded.

7.2 Recorded images are stored only for a period of 10 days unless there is a specific purpose for which they are retained for a longer period.

7.3 The 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:

7.3.1 CCTV recording systems being located in restricted access area.

7.3.2 The CCTV system being encrypted/password protected.

7.3.3 Restriction of the ability to make copies to authorised members of staff.

7.4 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 the School.

8 Disclosure of Images to Data Subjects

8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the School's Subject Access Request Policy.

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

8.4 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. The DPO will take appropriate measures to ensure that the footage is restricted in this way.

8.5 If the footage contains images of other individuals then the School must consider whether:

8.5.1 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.

8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

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

8.6.1 When the request was made;

8.6.2 The process followed by the DPO in determining whether the images contained third parties.

8.6.3 The considerations as to whether to allow access to those images.

8.6.4 The individuals that were permitted to view the images and when; and

8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

9 Disclosure of Images to Third Parties

9.1 The School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

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

9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the DPO will 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.

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

9.5 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.

10 Review of Policy and CCTV System

10.1 This policy will be reviewed Bi-Annually.

10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed Bi-Annually.

11 Misuse of CCTV systems

11.1 The misuse of CCTV system could constitute a criminal offence.

11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by the School should be made in accordance with the School's Complaints Policy, including members of the public etc.

Access to CCTV Image Request Form

DATA PROTECTION ACT 2018 and GDPR 2018

At CCTV – St. Margaret Clitherow – Quainton Street, London, NW10 0BG.

You must fill this form in if you require access to CCTV images held by the School.

SECTION ONE: YOUR DETAILS

Name:

Name of your company/organisation/ person you represent:

Position in the company/organisation:

SECTION TWO: WHY CCTV IMAGES ARE REQUESTED

Please tick the applicable box:

You represent the police or other law enforcement agency, and the images are required to prevent/detect a crime and/or identify, apprehend or prosecute offenders.

You represent a prosecution agency and require the images to prosecute an offender.

You are a solicitor, barrister or insurance company and require the images in connection with legal or other proceedings.

You represent the media, where disclosure of the image to the public is need in order to assist in the identification of a victim, witness or perpetrator in relation to the criminal incident.

SECTION THREE: DETAILS OF THE CCTV IMAGE YOU WANT ACCESS TO

(1.) What is the date, location and approximate time of the images you wish to view?

(2.) Please provide details of the incident and description or person, vehicle or property:

(3.) Will you need to take a copy of the images away from the site? YES / NO

(4.) If yes, please give reason.

SECTION FOUR: DECLARATION

I certify that I am authorised to represent the company/organisation/person listed above and the images are requested in connection with the prevention/diction of a crime, the apprehension or prosecution of offenders, criminal proceedings, public safety or the investigation of an insurance claim.

I confirm that the information I have provided on this form is true and accurate. I agree that I and the organisation/company/person I represent will only use the images in connection with the purposes for the School has provided me with the images.

(Insert name of organisation/company/person that is represented.)

I fully understand the implications of the Data Protection Act 2018 and GDPR 2018. They also understand that where the images are take off site into it's own possession it will become the Data Controller in respect of the personal data contained in those CCTV images.

Signed:

Date: