Friars Primary Foundation School - CCTV POLICY

Introduction

Friars Primary Foundation School maintains a CCTV system consisting of a number of fixed cameras which are located internally and externally (see appendix 1 for locations).
This policy takes into account the change in legislation of the Data Protection Act 2018.

The school recognises that CCTV systems can be privacy intrusive.

For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

This policy shall be reviewed regularly. Whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

This policy is written in conjunction with the Data Protection Policy.

This policy sets out the purposes of the system and the procedures to be followed when managing the system.

Objectives

The purpose of the CCTV system is to assist the school in reaching these objectives:

I. To protect pupils, staff and visitors against harm to their person and/or property.
II. To increase a sense of personal safety and reduce the fear of crime.
III. To protect the school buildings and assets.
IV. To support the police in preventing and detecting crime.
V. To assist in identifying, apprehending and prosecuting offenders.
VI. To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
VII. To assist in ensuring the school is a safe and well ordered environment.

Purpose of This Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school consists of two sets of cameras: 1. The main school and 2. The new build. See appendix 1 for details.

Statement of Intent

Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent 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.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system 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 will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception. The system at Friars is wired.

Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 40 days.

System Management

Access to the CCTV system and data shall be password protected.

The CCTV system will be administered and managed by Ann Mould (School Secretary) who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by the Headteacher.

The system and the data collected will only be available to the Systems Manager, his/her replacement and a designated list of authorised users as determined by the Headteacher (see appendix 2).

The CCTV system is designed to be in operation 24 hours each day, every day of the year, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned in paragraph 5.3 above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

Downloading Captured Data Onto Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures: -

(a) Each download media must be identified by a unique mark.

(b) Before use, each download media must be cleaned of any previous recording.

(c) The System Manager will register the date and time of download media insertion, including its reference.

(d) Download media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a download media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.

(e) If download media is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised users. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any download media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by the headteacher in consultation with the school's data protection officer.

Complaints about the use of CCTV

Any complaints in relation to the school's CCTV system will follow the school's agreed complaints procedure.

Request For Access By The Data Subject

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to Ann Mould (see appendix 3).

Public Information

Paper copies of this policy are available from the school office. It is also posted on the school's website

Signed: _____ (Headteacher) Date:

Signed: _____ (Governing Body representative) Date:

Review date:

Appendix 1:

Details of camera systems

1. **The main building:**

CAMERA number	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
1	Main gate	N	Y	F
3	Playground: Towards portacabin	N	Y	F
4	Playground: Log cabin and toilet exterior	N	Y	F
5	Playground: Towards MUGA	N	Y	F
7	Early Years Gate	N	Y	F
8	Fires escape stairs onto playground	N	Y	F
12	Playground: grass areas	N	Y	F

2. **The new building:**

CAMERA number	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
1	Playground entrance	N	Y	F
2	Car park and pedestrian gate	N	Y	F
3	Internal entrance to new building	N	Y	F
6	Pathway to school office	N	Y	F
7	External view of new building	N	Y	F
8	New building lobby	N	Y	F

Appendix 2:

<u>List of authorised users of Friars CCTV system:</u>

- Justin Burtt (Headteacher)
- Ann Mould (secretary)
- Diane Larkins (School Business Manager)
- Arturo Aretaga Nunez (Premises manager)

Appendix 3:

CCTV log. Requests for access to the system.

What has been requested	Purpose of request	Name/organisation of person(s) request	Date of request