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St James' Church of England Junior School (Voluntary Controlled)



CCTV Policy

Drawn up by	School Business Manager
Date	Spring 2023
Review date	Spring 2025

Headteacher : Rose Boland-Bourne
St James' C of E Junior School
Tower Hamlets Road
Forest Gate
London E7 9DA
020 8534 4030

Purpose

The purpose of this policy is to ensure that the school complies with the regulatory requirements, in particular, the Data Protection Act 2018 (DPA) when using a closed-circuit television (CCTV) system at the school. The system comprises a number of cameras located around the school site. Cameras are situated both internally and externally. All cameras can be monitored from a range of authorised devices including PCs and from authorised mobile phones via secure sign on.

Scope and Applicability

This policy applies to the entire CCTV system which includes cameras situated internally and externally. It also includes the monitoring of the system.

General Policy

The school will treat the system and all information, documents and recordings obtained and used, as data which is protected by the DPA. The system installed is compliant with the DPA, Human Rights Act and Regulatory Investigation Powers Act (RIPA).

Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school and its staff, students and visitors.

Storage and retention of CCTV images

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their value as evidence and to protect the rights of the people whose images have been recorded. All retained data will be stored securely, using on site systems. Data may also be held in online storage platforms for backup purposes.

The data is stored on a rolling 30 day basis. Following this retention period, the data is securely destroyed.

Regular audits are conducted to ensure that all cameras are operating correctly and that footage is clear.

Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available. If a staff member without authorisation is found to be accessing the equipment or footage, this may lead to disciplinary action being taken.

Subject access requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the DPA.

All such requests should be directed to the Head Teacher and processed in line with the subject access request procedure. Individuals submitting requests for access will be asked to provide sufficient information to enable the relevant footage to be identified. For example, date, time and location. In line with data protection regulations, the school will respond to requests within a month of receipt unless there are extenuating circumstances in which case a further two months extension may be required.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

The following categories of staff have access to CCTV footage:

- Senior Leaders
- Office Administrative staff
- Premises Manager

Access to and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the police and service providers to the school where they would reasonably require access to the data (e.g. investigators). Requests from police and other professional services should be made to the Head Teacher.

CCTV data may be used within the school's disciplinary and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Information from CCTV will not be used for any commercial purpose. Information transferred to DVD (or other appropriate media) will only be used for the investigation of a specific crime or incident. Release to the media will only be permitted with the written authority of the police if this was required as part of a police investigation.

Signage

The school will erect signs to ensure individuals are aware that they are in an area where camera surveillance is in operation. The signs will be clear, visible, readable and will contain the contact details for the school as well as the purpose for using a surveillance system.

Complaints

Complaints and enquiries regarding the operation of CCTV on the school site should be directed to the Head Teacher in the first instance. Any such complaints will be dealt with under the terms of the school's complaints policy.

Other relevant school policies

Other relevant school policies include the Data Protection Policy, Subject Access Policy and the Data Security Policy.

Roles and Responsibilities

There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held, recorded and used and to whom it may be disclosed.

As Data Controller, the school is both legally responsible and accountable for the control of onsite CCTV. As such the school will allocate an individual for this task. Therefore the Head Teacher will take ultimate responsibility for the CCTV. However, the Premises Manager has day to day responsibility for ensuring the CCTV system is operational.

Compliance

Compliance is mandatory and will be enforced for all employees, visitors and contractors. Non compliance with this and other policies may be subject to disciplinary action, up to and including dismissal.

Risk Management

Risk management for the School is set out in the Risk Register.

References

Further information on CCTV and its use is available as follows:

- In the picture: A data protection code of practice for surveillance cameras and personal information
- www.ico.org.uk
- RIPA 2000
- DPA 2018
- PFA 2012

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Definitions

CCTV - Closed Circuit Television

SAR - Subject Access Request

DPA - Data Protection Act 2018

RIPA - Regulation of Investigatory Powers Act 2000

PFA - Protection of Freedoms Act 2012