

DIOCESE OF CHICHESTER

CCTV Policy

Date Agreed:	May 2021
Review Date:	July 2024
Type of Policy:	DCAT Policy – schools
	to personalise

Revision Number	Date Issued	Prepared by	Approved	Personalised by school	Comments
4	July 2023				Reviewed by school as dated for review May 2023. No changes made, other than school contact details
3	January 202 I	CF	25/2/21		No changes
2	December 2018	SJP/DC			
	May 2017	SJP/DC			

Type of Policy	Tick 🗸
DCAT Statutory Policy	
DCAT Non-statutory Policy	✓

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Introduction

Our **vision** for our Trust is we exist to:

Help every child achieve their God-given potential

Our **aims** are clear. We aim to be a Trust in which:

Developing the whole child means pupils achieve and maximise their potential

Continued development of staff is valued and improves education for young people

All schools are improving and perform above national expectations

The distinct Christian identity of each academy develops and is celebrated

Our work as a Trust is underpinned by shared **values**. They are taken from the Church of England's vision for Education and guide the work of Trust Centre team. They are:

Aspiration

I can do all things through Christ who strengthens me (Philippians 4 vs 13).

Wisdom

Listen to advice and accept discipline, and at the end you will be counted among the wise (Proverbs 19 vs 20)

Respect

So in everything do to others what you would have them do to you (Matthew 7 vs 12)

Our vision of helping every child achieve their God-given potential is aligned with the Church of England's vision for education and is underpinned by the Bible verse from John: *I have come that they may have life, and have it to the full.*



Our Vision

Loving learning and loving one another, as God loves us.

Celebrating success in its many forms and overcoming challenges.

Praying for and caring for our whole community.

Learning to live in the light of Christ and as a light to others.

I. Policy Aims

DCAT recognises that CCTV systems can be privacy intrusive. For this reason, St John's Meads CE Primary 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 St John's Meads CE Primary School's use of CCTV and the contents of this policy.

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

Review of this policy shall be repeated regularly and 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.

2. Objectives

The purpose of the CCTV system is to film and record images to assist St John's Meads CE Primary School in reaching these objectives:

- a. To protect pupils, staff and visitors against harm to their person and/or property.
- b. To increase a sense of personal safety and reduce the fear of crime.
- c. To protect the academy buildings and assets.
- d. To support the police in preventing and detecting crime.
- e. To assist in identifying, apprehending and prosecuting offenders.
- f. To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- g. To assist in managing St John's Meads CE Primary School.

CAMERA TYPE	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED	
		Y/N	Y/N	S/F	
Bullet	Main entrance hall	Ν	Y	F	
Bullet	Outside main office facing down ramp towards Rowsley Gate	Ν	Y	F	
Bullet	Outside Headteacher's office facing Rowsley Gate	N	Y	F	
Bullet	Corridor outside Y5	Ν	Y	F	
Bullet	Upstairs Landing Y3/4 toilet/Art	Ν	Y	F	
Bullet	Playground/Hall door/facing play- Ground area to Edensor wall	N	Y	F	
Bullet	Playground/Hall wall/facing up towards back playground wall.	N	Y	F	
Bullet	Playground outside Y6 classroom facing Edensor Gate and playground area		Y	F	

The CCTV system used by St John's Meads CE Primary School comprises of:

3. 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.

St John's Meads CE Primary 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.

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 no longer than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.

4. System Management St John's Meads CE Primary School

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

The CCTV system will be administered and managed by Katherin Weeks 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 Lara Cork.

The system and the data collected will only be available to the Systems Manager, their deputy and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation 24 hours each day, every day of the year though St John's Meads CE Primary 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 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. The System Manager will advise the DCAT Compliance Manager of the request.

Details of all access will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing. Also, no matter circumstances of the request for access to the CCTV system a record of everyone present to witness images or taking them away should be kept and the equipment should not be left unattended by the System Manager/deputy.

5. 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, their deputy and the Headteacher and other authorised senior leaders. 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 St John's Meads CE Primary School, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. St John's Meads CE Primary 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 St John's Meads CE Primary 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 St John's Meads CE Primary School Data Protection Officer and a decision made by a senior leader of St John's Meads CE Primary School in consultation with the academy's Data Protection Officer.

6. Complaints About the Use of CCTV

Any complaints in relation to St John's Meads CE Primary School CCTV system should be addressed to The Headteacher, via the school office <u>office@sjm.academy</u>

7. 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 The Headteacher, via the school office <u>office@sjm.academy</u>

8. Public Information

Copies of this policy will be available to the public by emailing office@sim.academy