

St Nicholas Primary School



CCTV Policy

September 2023

Introduction

St. Nicholas Primary School uses Closed Circuit TeleVision (CCTV) images for security and the prevention of crime, to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property. The use of CCTV, and the associated images is governed by the Data Protection Act. This policy outlines the school's use of CCTV and how it complies with the Act.

We may disclose CCTV footage to the Police or other bodies with enforcement powers where it is deemed necessary for the prevention or detection of crime or the apprehension or prosecution of offenders. We may also be required by law to disclose footage where a court grants an order for disclosure.

The system comprises a number of fixed cameras. The system does not have sound recording capability. The CCTV is monitored centrally by the Admin Office.

The CCTV system is owned and operated by the school. Changes to the use or deployment of the system are determined by the school's leadership team.

The introduction of new cameras or any significant changes to the direction or location of current cameras will be subject to a Privacy Impact Assessment.

St. Nicholas Primary School – Mrs Leaf - is registered as a Data Controller with the Information Commissioner's Office, the details may be viewed at the following link – <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

Compliance

The school makes all reasonable efforts to comply with the Information Commissioner's Office CCTV Code of Practice and the Surveillance Commissioner's Code of Practice.

The school notifies the Information Commissioner of its processing of personal data, including CCTV footage, each year through its registration no.

CCTV warning signs will be maintained and prominently displayed at all entrances to the areas where cameras are deployed, including school gates where outdoor areas are included in the cameras' coverage.

The school maintains its CCTV Policy which will be reviewed at least every 3 years; the next review is scheduled for no later than Summer 2026.

Disciplinary action will be taken against any member of staff who is found to have intentionally misused the CCTV system. Any wilful breach of confidentiality will be dealt with as a serious breach of the School's policies and the employee's contract of

employment. Any such incidents will be fully investigated and are likely to be reported to the Information Commissioner's Office and/or the Police.

Siting of Cameras

The school will make all reasonable efforts to ensure that cameras are operated responsibly and unwarranted intrusion into any person's privacy is avoided. Cameras will not be sited in toilets or changing rooms. CCTV will not be used in classrooms.

The school will make every effort to position cameras so that their coverage is restricted to the school premises. The school will ensure particular care is taken to protect the privacy of local residents' homes and gardens.

Members of staff will normally be aware of all camera locations, with the exception of cameras placed for the purpose of covert monitoring.

Should any person have concerns about the location or orientation of cameras they may ask the senior leadership team to review the siting of the relevant camera(s).

Covert Monitoring using CCTV Cameras

The school may, in exceptional circumstances, set up covert monitoring. For example:

- i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained from a member of the senior leadership team and external legal advice will be obtained in respect of any proposed monitoring.

Covert monitoring must cease following completion of the investigation.

Retention of CCTV Data

Data will not be retained for longer than is necessary and all retained data will be stored securely. Unless it is being retained for a specified purpose, CCTV data will normally be retained for 90 days before being deleted/overwritten by new data.

Access to CCTV images

Access to recorded images will be restricted to authorised members of staff. Requests for access to CCTV footage will be considered by a member of the senior leadership team.

The Police may request access to CCTV data and such requests must be made on a Humberside Police DP9 form or appropriate Data Protection Act Section 29 form. Access to CCTV footage may be provided to the Police without a prior written application only if there is believed to be an immediate risk to a person's health or

wellbeing. The reason for any such access will be logged and this will include the Police Officer's name and badge number

Subject Access Requests (SAR)

Any person may request access to CCTV footage which identifies them through the Data Protection Act. All requests should be made in writing to the Head Teacher.

Applicants must provide enough information to enable the school to identify the footage they require, for example, the date, time, location and a description of their appearance. The applicant may also be required to provide proof of their identity prior to disclosure.

The school will respond to requests within 30 calendar days of receiving the written request and a description of the data being sought.

The school reserves the right to refuse access to CCTV footage where this would prejudice the privacy of other persons or prejudice an investigation. In circumstances where we cannot provide you with a copy, we may sometimes be able to balance your right of access against other people's privacy by allowing you to view footage.

Further Information and Complaints

The school received 0 complaints in respect of its CCTV system during 2021-22.

Enquiries or complaints about the operation of CCTV within the school should be directed to the Head Teacher at the address below. Any person may also submit a Freedom of Information request for information about how the CCTV system is operated though details may not be provided where disclosure would compromise safety, security or the rights of third parties.

Head of School – Mrs S Leaf
St. Nicholas Primary School
Cottingham Road
Hull
HU6 7RH

Additional Information

Further information on CCTV can be obtained from:

Surveillance Camera Commissioner,
<https://www.gov.uk/government/organisations/surveillance-camera-commissioner>

The Information Commissioner's Office,
<https://ico.org.uk/for-the-public/cctv/>