



ST MARGARET'S CE PRIMARY SCHOOL

“The Roots to Grow and the Wings to Fly”

CCTV Policy

This policy will be reviewed every 3 years by the Governing Body

Every Child Matters

Reviewed by Governor	E Prokipczuk
Date	18.03.19
Re-Adopted by Governors	
Signed on behalf of Governing body	
Next review	Spring 2020



St Margaret's CE Primary School CCTV Policy

The School understands that CCTV and recording of images of individuals constitutes as processing personal data, so it is carried out in line with data protection principles. This policy has been written with due regard to current legislation on Data Protection, Freedom of Information, current Children's Acts and the ICO (Information Commissioner's Office) code of practice for surveillance cameras.

The CCTV cameras at St Margaret's were installed several years ago. At that time staff and parents were notified of our intention and reasons to use them and no concerns were identified.

We have considered the impact of persons recorded and are happy that we are we can legally record this information for the purposes stated below. Parents require their children are protected from strangers. Visitors understand that safeguarding is vitally important and that we take it seriously at St Margaret's.

The ICO have been informed that the system is in place and they also have a copy of this policy. It is no longer necessary to inform them after each review as long as the ICO registration fee is paid by IPAT.

The CCTV system and this policy will be reviewed annually to ensure ongoing compliance. (Please see appendix 1 for ICO Annual Review Checklist template) Any changes will be communicated with staff and parents. The policy will be published on the school website.

KEY PERSONNEL		
I.P.A.T.	Data Controller	
Emma Prokipczuk	Headteacher	Responsibility for system
Andrea Mepstead	SBM	System operator
Sarah Hill	Admin Officer	System operator
Amanda Read	Premises Officer	System operator
Other staff	If covering the office	Monitoring screen re visitors only

Purpose of the CCTV system

The cameras were authorised by the Full Governing Body.

- They were installed to maintain a safe environment for staff, pupils and visitors, in particular to safeguard pupils from strangers entering our school site. At certain times of the school day pupils and visitors could overlap in the designated route to the main school entrance area due to the positioning of the KS2 exit.



- They were installed in light of safeguarding incidents and possible terrorist threats in this country.
- They were installed so that admin staff and the headteacher could monitor visitors before allowing them access to the site. They can see if pupils are in that area at the same time.
- They also help with site security; particularly during the time the school is closed, this is to deter criminals, to avoid damage/vandalism and loss of school assets.

Scope of the CCTV cameras in use

Our cameras are image recordings only and do not record audio footage. We review their necessity and coverage regularly (annually as a minimum).

They cover:

- Very clearly ~ The areas showing the route visitors take when entering school via the pedestrian security gate.
- From a distance ~ The area from the main school gate, part of the car park and the walkway down to the pedestrian security gate.
- At a greater distance ~ The open gate way with the public footpath and road beyond. At that distance persons and vehicles cannot be individually identified.

Protection of the Data recorded

We take an individual's rights and privacy seriously and we intend for data to be processed lawfully, fairly and in a transparent manner.

Notices are in place along the route, which is being recorded at close range, to inform parents and visitors that they are in use.

Images are stored for a maximum of 2 months on the hard drive and they are overwritten, as the recording is continuous. Recordings are not archived by the school. The retention period is long enough for any incidents, which may come to light, can be investigated.

The Data is protected from unlawful and inappropriate use as it is on a hard drive inside the recording device, which is situated in the main admin office. This room is locked when the school is closed.

The office is manned, by staff, at all times and entry is restricted.



The system monitor is turned on each morning and is positioned on the wall in front of the Admin Officer's desk. A visual check is made to ensure all is in working order. If it is not then immediate action is taken to request an engineer call out.

Release of CCTV footage or Information to a third party.

Releasing CCTV footage to third parties will be permitted only in the following and prescribed circumstances and to the extent required or permitted by the law:

- The Police – where the images recorded would assist in a specific criminal enquiry
- CPS (Crown Prosecution Service)
- Relevant legal representatives i.e. Barristers and Lawyers
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000

Requests for disclosure will be recorded and the Headteacher will refer to the Data Protection Officer (details of these below) as to whether recorded images may be released to these persons.

The Data Controller (DC)

The DC is IPAT (Inspiring Primaries Academy Trust) who delegate the responsibility to the Headteacher of the school to ensure that the:

- The security of the system is maintained and that the system is accessed in accordance with regulations and this policy.
- Staff and parents are notified of any changes to the policy or siting of cameras.
- Requests for access to data, SARS (Subject Access Requests) and Police requests are dealt with in a timely manner and in line with regulations. Comprehensive records of these must be maintained, as they could be made public later.
- Governors review the policy annually.
- The ICO are re-notified annually.

The authorised operators of the system are the key personnel stated on page one of this document.

The Data Protection Officer (DPO)

The DPO for our school is Warwickshire County Council and they can be contacted at:

schoolDPO@warwickshire.gov.uk

OR

Warwickshire Legal Services

PO Box 9



Shire Hall
Warwick
CV34 4RL

The DPO deals with:

- Freedom of Information requests
- Subject Access Requests (SARs).
- Ensuring the Data Controller (DC) is acting in line with regulations and legislation.
- Ensuring that data is obtained and stored securely.
- Dealing with any data protection complaints about our school.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the school in the first instance. If you are not satisfied with our response please contact the DPO as above.

Alternatively, you can make a complaint to the ICO (Information Commissioner's Office).

You can:

- Report a concern online at <https://ico.org.uk/concerns/>
- Or Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF



Appendix 1

Review of CCTV systems and Policy ~Checklist for users of limited CCTV systems monitoring small retail and business premises. (ICO document)

This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used.

We, the Local Governing Body of St Margaret’s Primary School, Stoke Golding have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers/staff and pupils. It will not be used for other purposes.

Initial notification has been submitted to the Information Commissioner (March 2019)
There are named individuals who are responsible for the operation of the system.
The problem we are trying to address has been clearly defined and installing cameras is the best solution.
A system has been chosen which produces clear images, which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.
Cameras have been sited so that they provide clear images.
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.
The 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.
Except for law enforcement bodies, images will not be provided to third parties.
The potential impact on individuals’ privacy has been identified and taken into account in the use of the system.
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the DPO or Information Commissioner as soon as such a request is made.
Regular checks are carried out to ensure that the system is working properly and produces high quality images.



Declaration

As the Headteacher of St Margaret's School I have reviewed this document and policy.

_____ date: _____

As Chair of the Local Governing Body, I can confirm that we have reviewed this CCTV policy.

_____ date: _____

Next annual review date: _____

IT IS NO LONGER NECESSARY TO NOTIFY THE ICO OF THIS POLICY OR OUR REVIEW BUT IT IS BEST PRACTICE TO CARRY OUT A REVIEW ANNUALLY AND FOR IPAT TO CONTINUE THE REGISTRATION WITH THE ICO.

Queries to: casework@ico.org.uk

St Margaret's CE Primary School is part of The Inspiring Primaries Academy Trust (IPAT), who has paid the ICO registration fee on our behalf as our Data Controller.

IPAT registered office: Church Lane, Gilmorton, Leicestershire.