



St Matthew's Primary School

CCTV Policy

Date Policy Written: May 2018

Review Cycle: Annual basis or sooner if required.

Ratified by SLT : May 2026

Next review date: May 2027

This Policy must be read in conjunction with : N/A

Introduction

St Matthew's Primary School is fully committed to the safety of its staff, pupils and visitors and for this reason has invested in the security of its buildings and facilities.

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

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 1998. The person ultimately responsible for data protection within St Matthew's is the Headteacher.

The system comprises a number of fixed and dome cameras located externally around the school site and internally in the school's Reception area and Alternative Learning Provision. Internal cameras also have audio recording. All cameras may be monitored and are only available for use by approved members of staff.

The CCTV system is owned by the school and is subject to review annually.

Objectives of the CCTV System

The objectives of the CCTV system are:-

1. To protect the school site and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
2. To increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime.
3. To support the police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders on the School site.
5. To protect members of the public and private property.
6. To assist in the usage and management of the school site on a day to day basis.
7. To safeguard all service users in the widest sense.
8. For training purposes as deemed appropriate by the Headteacher.
9. To support the Discipline Policies of the school for both pupils and staff under the discretion of the Headteacher.

Statement of Intent

1. The CCTV system will be registered with the Information Commissioner under the terms of the General Data Protection Regulations and will seek to comply with the requirements of both the GDPR and the Commissioner's Code of Practice.
2. The school will comply with the GDPR with regard to all information, recordings and downloads which relate to the CCTV system.
3. Cameras will be used to monitor activities within the school site both indoors and outdoors and the car parks, to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants within the school, together with its visitors.
4. Staff have been instructed to ensure that static cameras do not focus on private homes, gardens and other areas of private property.
5. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation from the Headteacher being obtained.
6. Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.
7. The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.
8. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school's CCTV.

Operation of the System

The system will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in this Policy.

1. The day-to-day management will be the responsibility of the Premises Manager.
2. The CCTV system will be operation 24 hours each day, every day of the year.

CCTV System

1. The Premises Manager will check and confirm the efficiency of the system on a daily basis and in particular that the equipment is properly recording and that cameras

are functional.

2. Access to the CCTV will be strictly limited to the members of staff approved by the Headteacher.

3. Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.

4. The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Headteacher. If permission is granted to view the CCTV by the Headteacher, the member of the public must be accompanied throughout the visit by a member of staff.

5. Other administrative functions will include filing and maintaining occurrence and system maintenance logs by the ICT Manager / Premises Manager.

6. In the event of an emergency which requires an immediate contact with the emergency services they are to be contacted by a member of staff. The emergency procedures identified in the Health and Safety Policy will be adhered to.

Liaison

1. Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

Monitoring Procedures

1. Camera surveillance will be maintained at all times for monitoring purposes.

2. A monitor is installed to which pictures will be continuously displayed.

Video Download Procedures

1. Recordings may be viewed by the police and authorised officers for the prevention and detection of crime. Permission to do this will be given from the Headteacher.

2. A record will be maintained of the release of downloads to the police or other authorised applicants. A register will be available for this purpose and will be kept by the ICT Manager.

3. Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police must comply with the GDPR.

4. Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will

only be released to the police on the clear understanding that the media used remains the property of the school, and both the media and information contained on it are to be treated in accordance with this Policy. The School also retains the right to refuse permission for the police to pass to any other person the media or any part of the information contained thereon.

5. Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the Headteacher. In these circumstances downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances.

6. Downloads may be used within the school, at the discretion of the headteacher, for the purpose of supporting the school's discipline policies and training in specific circumstances e.g. during an investigation into a fight on the playground or de-escalation training for staff.

7. All recordings are stored on the CCTV system in the Store cupboard next to the COSHH cupboard for a period of up to 1 month, after which the data is overwritten. The recording is not viewable anywhere other than directly on the password protected CCTV system unless downloaded.

8. Downloaded footage will be kept only for as long as the footage is relevant.

Breaches of the Policy (including breaches of security)

1. Any breach of this Policy by school staff will be initially investigated by the Headteacher (following the GDPR guidelines for a data leak if required) in order that the appropriate disciplinary action can be taken.

2. Any serious breach of the Policy will be immediately investigated (following the GDPR guidelines for a data leak if required) and an independent investigation carried out to make recommendations on how to remedy the breach.

Assessment of the Scheme and CCTV Usage Policy

The performance monitoring of the CCTV system will be, including random operating checks, by the approved persons.

Complaints

1. Any complaints about the school's CCTV system should be addressed to the Headteacher.

2. Complaints will be investigated in accordance with school's Complaints Procedure.

Access by the Data Subject

1. The GDPR provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
2. Requests for Data Subject Access should be made in writing to the Headteacher (refer to the Freedom of Information policy for further information).

Public Information

Copies of this Policy will be available to the public, by making a request to the Headteacher.

System Maintenance and Monitoring

1. The system will be maintained in accordance with the GDPR.
2. The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).
3. It will be the responsibility of Premises Manager to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.
4. It will be the responsibility of Premises Manager to arrange regular system reviews with the maintaining company.

Summary of Key Points

- This CCTV Usage Policy will be reviewed on an annual basis
- The CCTV system is owned and operated by the school
- The CCTV system will be overseen by authorised members of staff
- The CCTV Policy will be shared with all new employees as part of the school's Induction Protocol
- The CCTV system cannot be accessed by visitors/ members of the public except by prior arrangement with the Headteacher and at the Headteacher's discretion with good reason
- Liaison meetings may be held with the police and other bodies. A Copies of downloads may only be viewed by authorised staff and the police
- Copies required as evidence will be properly recorded witnessed and packaged

before copies are released to the police

- Copies will not be made available to the media for commercial or entertainment reasons
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy
- Any breaches of this Policy will be investigated by the Headteacher
- An independent investigation will be carried out for serious breaches
- Breaches of the Policy and recommendations will be reported to the Headteacher
- The system will be maintained on a regular basis by an approved contractor