Lent 2019

CCTV Policy

Principles

The School of St Helen and St Katharine (the School) uses CCTV on all of its sites. The installation and use of the technology is in line with the Data Protection Code of Practice[1]

- The CCTV system will be operated fairly and lawfully and only for the purposes set out in this policy
- The CCTV system will be operated with due regard for privacy of the individual.
- Any changes to the purposes for which the CCTV system is operated will require prior approval of the Bursar

Scope

This policy applies to all School staff, students, governors, contractors and other visitors.

Ownership and Operation

The CCTV system and all recorded material are owned by the School.

Purpose of the system

SHSK uses CCTV technology to:

- Act as a deterrent to crime against the fabric of the school and/or staff/students/visitors.
- To reduce the fear of crime and help to create a safer environment
- To monitor car park safety
- Support the welfare of students, staff and visitors to our site

System Details

The CCTV systems comprise visible cameras situated in various locations around the estate, which continuously record activities in these areas. The images are stored in digital files which are kept in secure, locked areas accessible only by authorised staff.

Location and Signage

Cameras shall not be hidden from view and warning signs will be prominently displayed by each camera. Signage will be compliant with current requirements.

[1] In the picture: A data protection code of practice for surveillance cameras and personal information

Data Protection Act (DPA)/General Data Protection Regulations (GDPR)

Where images of living, identifiable individuals are deliberately recorded, this is likely to compromise those individual's personal data. The collection, use and storage of personal data is governed by the DPA 2018 and the GDPR. SHSK is registered with the Commissioner as a data controller.

Given that any particular sequence of CCTV recording may include personal data; all such recordings will be treated in accordance with the data protection principles, further details of which can be found in the School's Data Protection (Privacy) Notice .

The rights of the Data Subject, including a right of access to their personal data will be respected where recordings are confirmed to comprise of personal data. Where an individual requests access to recordings believed to be their personal data, the matter shall be referred to the Compliance Coordinator.

System Images

There will be no routine monitoring of data captured by CCTV for disciplinary purposes but in the event of an incident or allegation in relation to a visitor, student or member of staff, any existing footage may be reviewed if relevant to the allegations.

For operational purposes and in accordance with the stated purposes of the system, only designated staff shall have primary access to CCTV recordings. The Bursar or Compliance Coordinator in his absence may permit the viewing of CCTV recorded materials by Police and other emergency services, where this is necessary in connection with a serious occurrence. The Bursar, or Compliance Coordinator in his absence, will have authority for making a decision regarding who should have access to this data other than designated staff and ensuring that data is used in accordance with the DPA.

Maintenance

The CCTV system will be operational 24 hours a day, every day of the year. The Estates Manager will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis. The system will be checked and (to the extent necessary) serviced no less than annually.

Storage of Data

The day-to-day management of images will be the responsibility of Estates Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint as his deputy. Images will be stored for up to 14 days, and automatically over-written unless the school considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

Downloading of recorded material

CCTV data should not be downloaded due to potential infringement of legislation.

CCTV recordings may be disclosed to third parties such as the Police but only where such disclosure is in accordance with relevant legislation. Staff, students and visitors are also reminded that although the primary purpose of the School's CCTV system is the detection and prevention of crime, any evidence of misconduct captured incidentally on these cameras can be used as evidence in disciplinary matters.

Once a request to save information is received, the Bursar, or Compliance Coordinator in his absence, will together with the System Manager or his deputy, collate the required data, which will be securely retained together with a digital evidence log sheet. This log is signed by the person downloading the data and also by the external Investigating Officer requesting the information. Should information be shared to a statutory authority, they will become the defacto data controller.

Data Subject Access Request

CCTV digital images, if they show a recognisable person, are personal data and are covered by the DPA, and GDPR. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act.

Data Subjects may make a Subject Access Request for CCTV images by applying in writing to the Compliance Officer at gdpr@shsk.org.uk providing the following information:

- dates and times of the incident or their visit to the School with details of the specific location on the School premises;
- proof of identity (e.g. driving licence/passport containing a photograph);
- any other information relevant to the incident.

A response will be provided promptly and in any event within 30 days/one month of receiving the required information.

the School has the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

Retention and disposal of recorded materials

CCTV recordings and other materials produced from them shall be retained for 14 days unless an incident is recorded which requires further investigation. In the latter case, recordings shall be kept for a minimum of three years from the date of recording. All media no longer required, on which recordings were made will be returned to the Data Controller to be securely disposed and the appropriate details entered in the destruction records.

Other CCTV systems

The school does not own or manage third party CCTV systems but may be provided by third parties with images of incidents where this in line with the objectives of the school's own CCTV policy and/or its School Rules. Many students travel on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these in establishing facts.

Breaches of the code and complaints

Breaches of this policy should be reported immediately to the Compliance Coordinator. Any complaint concerning misuse of the system will be treated seriously and fully investigated.

Breaches of this policy by staff shall be dealt with in accordance with the Disciplinary Procedure[2].

Policy initiated……..…….……... Lent 2019

Next Review date ……..…… Lent 2020

Person Responsible …….. Bursar

Audience ……. Staff/Parents

[2] See Staff Handbook

Annex A to CCTV Policy

Checklist for users of CCTV systems monitoring premises already registered with the ICO (e.g. schools).

This CCTV system and the images produced by it are controlled by St Helen and St Katharine. The Bursar is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

St Helen and St Katharine have considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of staff and students.

It will not be used for purposes other than those stated in the policy. The School conducts an annual review of our use of CCTV.

	Checked (Date)	**By (Data Controller signature)**	**Date of next review**
Notification submitted to the Information Commissioner has been updated to include CCTV and the next renewal date recorded.			
There is a named individual who is 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. This decision should be reviewed on a regular basis.			
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 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.			
Please keep this checklist in a safe place until the date of the next review.			

Information taken from https://ico.org.uk/media/1542/cctv-code-of-practice.pdf