



St. Mary's  
Catholic Federation

St Mary's Catholic Federation, Carshalton

## *Learning, playing and growing together in the love of Jesus*

### **CCTV Policy (Statutory) (Annual)**

To be read in conjunction with the following policies, Data Protection Policy, Data Retention Policy, Freedom of Information Policy

St Mary's Catholic Federation, Carshalton uses closed circuit television (CCTV) images to monitor the schools buildings in order to provide a safe and secure environment for pupils, staff and visitors, to prevent the loss or damage to property and to assist in the investigation of accidents, incidents and near misses. This purpose has been established under Principle 1 of the Surveillance Camera Commissioner's Code of Practice.

**Author: SLT**

**Committee: Resources**

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**Date Approved: January 2022**

**Date of Review: January 2023**

**Approved by Full Governing Body on Date: March 2022**

**Chair of Governors**

**St Mary's Catholic Federation, Carshalton**

#### **Safeguarding Statement**

This school takes notice of and adheres to all the national and local policies and guidance in regard to Safeguarding Children and Young People.

Lead Safeguarding Person Junior School: Miss M Kenny

Lead Safeguarding Person Nursery & Infant School: Mrs. M Quinn

Safeguarding Deputies: Mrs. S Hulme and Miss E Bryant (Infants), Mrs S Hulme and Miss F Sullivan (Juniors)

Governor designated safeguarding officer: Mr. T Richmond



*"St Mary's is committed to being a Rights Respecting School to inspire and support the children, parents and school governors in school and the wider community."*

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## **Basic information**

St. Mary's Catholic Federation, Carshalton's CCTV system for each school comprises a number of cameras covering external and some internal areas of the school.

The CCTV is monitored from the school office.

The introduction of, or significant changes to, CCTV monitoring will be subject to consultation with the school community and other relevant stakeholders.

The use of CCTV, and the associated images, is covered by relevant data protection legislation. This policy outlines the Federation's use of CCTV and how it complies with this legislation.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained 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

## **2. Statement of intent**

The Federation complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and to foster both trust and confidence in its continued use. The Code of Practice is published at:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

CCTV warning signs are clearly and prominently placed at all external entrances to the schools, including the gates, as coverage includes outdoor areas. Signs contain details of the purpose for using CCTV. In areas where CCTV is used, the school ensures that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design has endeavoured to ensure that the scheme 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.

## **3. Siting the cameras**

Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The Federation ensures that the location of equipment is carefully considered to comply with data protection legislation.

The Federation will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas. Some coverage of public areas is inevitable but will be kept to an absolute minimum.

CCTV will not be used in classrooms.

Members of staff are aware of where CCTV cameras are situated with the exception of cameras placed for the purpose of covert monitoring.

## **4. Covert Monitoring**

The Federation 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 written authorisation must be obtained from the Executive Headteacher or Chair of Governors before allowing such an operation to take place.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

Covert monitoring will cease following completion of an investigation

## **5. Storage and Retention of CCTV images**

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. Typically, recorded data will be retained for thirty (30) days only.

All retained data will be stored securely with access controls in place.

Images and information relating to a reported incident will be retained until such time as the incident is resolved and/or all the information and images have been passed on to official third parties (see section 8).

## **6. Access to CCTV images**

A log will be made each time CCTV images are accessed and this log will be reviewed annually. Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available. A list of staff that have access to the CCTV system will be maintained. Unauthorised access and viewing of images will be sanctioned under the staff discipline policy or by referral to the appropriate authorities where necessary.

## **7. Subject Access Requests**

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR and the Data Protection Act.

All requests should be made in writing to the Data Protection Officer. Individuals submitting requests for access will be asked to provide a form of identification and sufficient information to enable the footage relating to them to be identified, for example date, time and location. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **8. Access to and disclosure of images to third parties**

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators) and is allowed for under relevant legislation.

Requests should be made in writing to the Data Protection Officer.

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## **9. Review of CCTV usage**

An annual review will be conducted at both schools to ensure that the use of CCTV remains proportionate and continues to meet the Federation's objectives.

## **10. Complaints**

Complaints and enquiries about the operation of CCTV within the school should be directed to the Data Protection Officer in the first instance. Complaints will be dealt with under the data protection policy and the complaint policy of the Trust.

Complaints will be acknowledged on receipt. An investigation will take place and a response issued by the Trust within ten working days.

## **10. Further Information**

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice (published by the Information Commissioner's Office)
- Privacy Impact Assessment (on Cirrus website)
- Annual reviews of each school's system
- [www.ico.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Legislation (GDPR)