


Policy for		
CCTV Policy		
Date of policy:	Summer Term 2021 (30.7.2021)	
Next review:	Summer Term 2022 (Review Annually)	Full Governing Body

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Legality

There are two important points within the CCTV Code of Practice 2008 which are basic points of law that must be adhered to.

CCTV Signs

CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located at the entrance gate, the building entrance and inside reception.

Registering the CCTV System

St Modwen's Catholic Primary School registration number with the

Information Commissioners office is **Z4844057**

The Data Protection Act 2018 and UK GDPR

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is "Personal data" means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

The definition of Processing is much wider in its scope than the previous legislation)
"Processing", in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as— (a) collection, recording, organisation, structuring or storage,
(b) adaptation or alteration,
(c) retrieval, consultation or use,
(d) disclosure by transmission, dissemination or otherwise making available,
(e) alignment or combination, or
(f) restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

Objectives

Operators of the system have access to a clear statement of the objectives of the system and responsibilities of those involved in its operation and management and to restrict unauthorised persons from gaining access to recorded images.

Confidentiality

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

Copy Recordings

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

Information Sharing (Section 115, Crime and Disorder Act 1998)

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities.

The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.

Retention

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is **30 days**.

Erasure

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

Covert Recording

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs is a breach of the Data Protection Act.

However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:

We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.

We have reasonable cause to suspect specific criminal activity is taking place.

That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.

We have decided in principle that we wish to adopt covert recording. We have a clear documented procedure which sets out how we determine whether the use of covert recording is appropriate in an individual case. A confidential appendix regarding our decision that covert recording is appropriate is lodged with the Head Teacher/ Chief Executive Officer

Use of Recordings

The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environs
- Pupil behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals

When using CCTV footage for any of the above purposes it shall be permissible to access and enable relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below.

Traceability and Record Keeping

Recordings must be logged and traceable throughout their life within the system. If images are copied to a third party media this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a maintenance company.

Original recordings are only found:

- a) Within the recognised secure storage system
- b) Operational in the recording device
- c) Secured in an evidence bag

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

Time and Date Stamping

The correct time and date is overlaid on the recorded image.

These date and time settings are checked and corrected as part of the routine maintenance visits.

Secure Storage of Recordings

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system.

Recordings and Recording/Processing equipment are located in a secured lockable enclosure accessible only to authorised persons. A register of authorised users is maintained at all times.

CODE OF PRACTICE POLICY STATEMENT

This code of practice policy statement relates to the Closed Circuit Television System installed within **St Modwen's Catholic Primary School**.

The system manager is the **Headteacher** of **St Modwen's Catholic Primary School** who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Other authorised personnel trained to operate the system are:

1. The **School Business Manager/School Business Officers and the Caretaker**.

The objectives of the system are
to assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent

- to give confidence to staff and visitors that they are in a secure environment □
to provide management information relating to Health & Safety matters □ to support pupil behaviour and discipline management.
- to record actions of staff, pupils and school visitors that may be used for disciplinary or monitoring purposes

System

The system comprises of the following primary items:

Recording media type	Digital Recorder DVR recording system Pelco IP DX4800 series		
The system records images from	Colour and Black and White cameras		
Monitors	1		
Fixed cameras	9		
Moveable cameras	0		
Covert cameras	0		
CCTV signs	4		

The operating manuals relating to the specific items of equipment have been compiled and are located in the respective CCTV Server Room. It is the responsibility of **the Headteacher** to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

General Principles

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.

GDPR Related Policies and Procedures

GDPR School Policies	Review Date
01 Data Protection Policy	August 2021
02 Breach and Non Compliance Policy	August 2021
03 Confidentiality Policy and Confidential Agreements	August 2021
04 CCTV Policy	August 2021
05 Workforce Acceptable use Policy	August 2021
06 Freedom of Information Policy	August 2021
07 Document and Data Retention Policy	August 2021
08 Privacy Notices: <ul style="list-style-type: none"> • Pupils Data • School Trips • Staff Workforce • Governors • Job Applicants • Coronavirus 	August 2021
09 GDPR Workforce and Governor Training/CPD	August 2021
10 GDPR Checks, Compliance and Audit Toolkit (GoGDPR)	August 2021
11 GDPR Subject Access Request Management and Procedures	August 2021
12 GDPR My rights a guide for data subjects	August 2021

APPENDIX A: SUBJECT ACCESS REQUEST

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of: St Modwen's Catholic Primary School.

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting www.ico.gov.uk.


St Modwen's Catholic Primary School will maintain a log of access requests detailing who the requests have been made by.

Issuer of the above footage

Name	Signature	Date

Recipient of the above footage

Name	Signature	Date
Address		
Identification		

Policy for		
<h1>Privacy Notice: School Trips</h1>		
Date of policy:	Summer Term 2021 (30.7.2021)	Committee: Full Governing Body
Next review:	Summer Term 2022 (Review Annually)	

When organising a school trip for pupils offsite, for any duration, it is important that necessary information is available or is shared with relevant third parties.

Information that may be shared will include both personal and special category, that is to say, more sensitive, data about pupils, staff and any volunteer helpers.

This may include, but is not limited to:-

- name;
- address;
- dates of birth;
- next of kin/emergency contact details;
- mobile numbers;
- landline numbers;
- email and other contact details;
- health and medication information;
- child protection information;
- pupil premium or other special status information; ☐ passport or other identity information as required.

This information will be contained securely as both hard copy and electronic information. This information will be shared as required with other third parties that can include transport providers, travel agency staff, venues, accommodation providers, immigration and/or police, and medical staff if it is necessary.

It is the responsibility of parents and carers for pupils attending trips to ensure that the relevant information is provided as requested.

Provision of this information is a requirement, failure to do so may result in the pupil's place on the trip being cancelled. Cancellation in these circumstances would not necessarily lead to a refund of any monies paid.

As we are processing data for the purposes of managing the school trip, the school's usual UK GDPR and data protection policy applies. Information about how the school controls and uses data is found within the main policy and also contained in the privacy notice that is on the school website in addition to the content of this notice.

