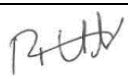



Ysgol yr Holl Saint All Saints' School



CCTV Policy

Equality Act Impact Assessment	YES	NO	April 2018
Last Review Date	September 2021		
Date to be reviewed by Senior Management Team	September 2024		
Date Adopted by Governing Body	21.09.2021		
Head Teacher - Mr Richard Hatwood			
Chair of Governors – Mrs Jane Tinniswood			



Introduction

Ysgol yr Holl Saint – All Saints' School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings and grounds in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

The system comprises a number of fixed cameras located on the outside of the building, covering entrances, play areas and school grounds. The system does not have sound recording capability.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team. The CCTV is maintained centrally from the school offices by the School Business Manager and the Head teacher acting as the Data Controlling Office

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community. The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

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 by the school data controller 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 and sound.

Statement of Intent

The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards 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>

In areas where CCTV is used, the school will ensure 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.

Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018.

The school will make every effort to position cameras so that their coverage is restricted to the outdoor school premises. CCTV will not normally be used within school;. Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

Covert Monitoring

This will only take place in exceptional circumstances under the direction/advice of the police, safeguarding agencies and the Local Authority Legal department

Storage and Retention of CCTV images

Recorded data will not be retained for longer than 6 months. 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.

All retained data will be stored securely.

Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018 and other relevant legislation.

All requests should be made in writing to the Head teacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The school will respond to requests within 1 calendar month of receiving the written request.

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.

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 safeguarding agencies where these would reasonably need access to the data (e.g. investigators).

Requests should be made in writing to the Headteacher

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

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Head teacher in the first instance.

Evaluation & Review

This policy will be reviewed by the Senior Management Team and Governing Body and adopted by the Governing Body as per the schedule on the front page.

Operational Requirements Review

CCTV System: Ysgol yr Holl Saint – All Saints' School, Gresford.

Responsible Officer: Richard Hatwood

Ser	Operational Requirements	Requirements Met/ Comments
01	What was the original reason for installing a CCTV system? Is it still relevant?	✓
02	What are the current CCTV systems Objectives?	Reduce risk of illegal entry and vandalism on site
03	Are the camera locations suitable for the task and do light levels or environmental issues such as tree growth affect them?	Suitable for task
04	Can the cameras produce good quality images on an 'open protocol' which can be used in court and is the monitor of a high enough quality to view images?	Yes
05	Are the cameras secure and protected from vandalism?	Yes
06	Is the recording equipment and media in a secure area? Is access to this equipment and CCTV images restricted?	Yes
07	Is the recording equipment of good quality and a storage capacity to ensure images are not corrupted and can be stored for a specified period of time?	Yes
08	Are there regular function checks to ensure all equipment is operating and recording correctly and that all images are stamped with the correct date /time?	Yes
09	Is there a comprehensive maintenance and cleaning regime in place?	Yes
10	Do you have appropriate and sufficient signage in place to warn people that CCTV is in use?	Yes
11	Is your Code of Practice on display so that members of staff and the public can read it?	Yes
12	Are audits carried out regularly to ensure the security of all equipment and media and is a record of the audits kept for inspection? Are all media movements, viewings and evidence issues recorded?	Yes

To be completed annually. One copy retained by the systems owner and a second copy sent to the SPOC by the 1st May.
Additional Notes:

Name of Inspecting Officer: Richard Hatwood
Location: All Saints' School, Gresford.

Signature:



Date: 01.09.2021.

Cam No	Date of Inst	Location	Arcs of Observation	Operational Task	Comments	Recommendations

CCTV Privacy Impact Assessment Form

This form establishes the impact of CCTV on people's privacy and should be used to assess whether CCTV is justified and how it should be operated in practice. Once completed it should be reviewed annually. Copy to be sent to the Council's SPOC annually in May.

Ser	Issues to be considered	Results of assessment
01	Who will be using CCTV Images? Who will be legally responsible under the DPA?	SMT of All Saints' V.A. School
02	Why do you need CCTV? What problems it is meant to address? What other solutions to the problems were investigated and why have they been rejected?	Reduce risk of illegal entry and vandalism on site. Other access to site have housing adjacent them, main risks are areas adjacent to Church as evenings and weekends that area is assessed as a risk
03	What are benefits to be gained by using CCTV?	Visual deterrence, ability to monitor people coming on site, reduce vandalism.
04	Can CCTV realistically deliver these benefits?	Yes
05	Do you need to identify individuals or can you use a scheme not capable of identifying individuals?	Ability to identify individuals a necessity
06	Can the system deliver the benefits now and in the future?	Yes
07	What future demands will arise for wider use of the images and how will you cope?	None
08	What are the views of those who will be under surveillance?	Staff and Parents have no objection to securing the site
09	How can you minimise intrusion of those who may monitored if specific concerns have been raised.	Restrict access to recorded images – SMT only
10	Is the system established on a proper legal basis and operated within the law: DPA, HRA, RIPA and FOIA?	Yes
11	Is the system necessary to address a pressing need, such as public safety, crime prevention, ASB or national security? If so what is the pressing need?	Crime prevention
12	Is the system justified in the circumstances?	Yes
13	Is it proportionate to the problem it is designed to deal with?	Yes
14	How has the capital and revenue cost been resolved?	Funding through H&S Dept, WCBC

Over All Comments on Assessment:

Location of Scheme: All Saints' School, Gresford

Name of Officer completing form: Richard Hatwood.

Date: 01.09.2021

