



Loreto High School Chorlton

CCTV Policy

Approved: June 2015

Introduction

- 1.1 Loreto High School uses closed circuit television (CCTV) images to
 - a) Maintain a safe environment, helping to ensure the welfare of pupils, staff and visitors
 - b) Deter criminal acts against persons and property
 - c) Assist the police in identifying persons who have committed an offence.
- 1.2 The system is a closed digital system and comprises of a number of fixed and dome cameras
- 1.3 Sound is not recorded by the CCTV system.
- 1.4 The CCTV system is owned and operated by the school. Its deployment is determined by the Headteacher and Governing Body.
- 1.5 The CCTV is monitored centrally from the school security desk by school staff.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Headteacher and the Governing Body
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV and the associated images is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

2. Statement of Intent

- 2.1 The school complies with Information Commissioner's Office (ICO) document 'In the picture: A data protection code of practice for surveillance cameras and personal information' (2014) 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>
- 2.2 CCTV warning signs are clearly and prominently placed at all external entrances to the school.
- 2.3 The CCTV system has been designed for maximum effectiveness and efficiency. The school cannot however guarantee that every incident will be detected or covered and 'blind spots' may exist in the areas covered.

3. Siting the Cameras

- 3.1 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.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor areas.

4. Covert Monitoring

- 4.1 The school 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.
- 4.2 In these circumstances authorisation must be obtained from a member of the senior management team. Covert monitoring must cease following completion of an investigation.

5. Storage and Retention of CCTV images

- 5.1 Recorded data will be retained for 28 days. After this period the system will automatically delete the data. 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.

6. Access to CCTV images and disclosure

- 6.1 Access to live and recorded images will generally be restricted to members of the senior management team, Raising Standards Leaders and Pastoral Leaders, who are authorised to view them for the purposes of investigating incidents. Other members of staff must obtain authorisation from the Deputy Headteacher before accessing CCTV footage.
- 6.2 Disclosure of information from CCTV must always be consistent with the purpose(s) for which the system was established (See Paragraph 1.0 above). For example School may show images to the Police or to individuals who are the subject of the surveillance and their Parents/Carers. The school will ensure that disclosure is fair to the individuals concerned and that privacy intrusion to any third party individuals will be minimal.
- 6.3 Requests for disclosure of recorded images should be made to the Headteacher. The School have discretion to refuse any request for information unless there is an overriding legal obligation, such as a court order or information access rights.
- 6.4 In the absence of a Court Order, there will generally be no disclosure of recorded data, on request, to third parties other than to authorised personnel such as Law Enforcement Agencies and service providers to the school where these would reasonably need access to support the school to further the goals of the CCTV system (see para 1.1) (e.g. investigators eg system maintenance)
- 6.5 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.
- 6.6 School will record the date of any disclosure made along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it.

7. Subject Access Request (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 7.2 All requests should be made in writing to the Headteacher. 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.
- 7.3 The school will respond to requests within 40 calendar days of receiving the written request and fee.
- 7.4 A fee of £10 will be charged per request.
- 7.5 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.
- 7.6 Please refer to our Data Protection Policy for more information on how to make a subject access request.

8. Complaints

- 8.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Further Information

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

- www.ico.org.uk
- Data Protection Act 1998
- Surveillance Camera Code of Practice, Home Office. June 2013