



CCTV POLICY

Audience	All students, parents/ carers, staff & governors
Date for renewal/updates/review	June 2020
Named person responsible for monitoring	Headteacher
Agreed by Personnel Committee	
Agreed by Governing Body	5 th July 2018

1. PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of Sir William Ramsay School.

Sir William Ramsay School uses the CCTV system primarily as a deterrent against crime, both during the school day and outside of school hours.

The CCTV is used to detect and record any incidents that arise, e.g. vandalism, unauthorised access and assault.

There are many schools that suffer bullying and at Sir William Ramsay we have an Anti-Bullying Policy which is applied rigorously and is available on our website. The CCTV system may be used to capture images of students who are bullying. As such, the school may take appropriate action as a result of any images captured. Where this does occur, parents/ carers will be able to view the images along with staff at the school. This will enable the school and parents/ carers to work together to resolve the problems that have occurred.

The CCTV system may be used as an additional source of evidence when there are concerns about punctuality of staff or students and there are discrepancies in the standard attendance information (registers, signing-in/oy book, care entry system, etc.) The CCTV system may be used as an additional source of evidence when excluding students.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out in rented premises, the school will ensure that CCTV

[Type here]

systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

3. GENERAL PRINCIPLES

Sir William Ramsay School, as the corporate body, has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, students and invitees to its premises. The school owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

Information obtained through the CCTV system may only be released when authorised by the Headteacher. Any requests for CCTV recordings/ images will be fully recorded and legal advice will be sought if any such request is made. (See "Access" below).

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Equality Policy, codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school.

All CCTV systems and associated equipment will be required to be compliant with this policy. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts 1988 and 2003.

4. 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>

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas.

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.

5. LOCATION OF CAMERAS

Cameras will be sited so they only capture images relevant to the purposes for which they were 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.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outside areas.

CCTV will not be used in classrooms but in areas within the school that have been identified by staff and students as not being easily monitored.

Members of staff should have access to details of where CCTV cameras are situated.

6. STORAGE & RETENTION OF CCTV IMAGES

Section 2(1)(c)(iv) of the Data Protection Acts states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular images/ recordings are retained specifically in the context of an investigation/prosecution of that issue. However, due to the long summer break in school, images need to be retained for a maximum of 40 days in order to ensure any issues over the long break are available when the school reopens.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 40 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

[Type here]

The images/ recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Police, the Deputy Headteacher, the relevant Year Head, other members of the teaching staff, and the parent/ carer of a recorded student). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Tapes/DVDs will be stored in a secure environment with a log of access to tapes kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

7. 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.

8. SUBJECT ACCESS REQUESTS (SAR)

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

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.

The school will respond to requests within 40 calendar days of receiving the written request and fee. A fee of £10 will be charged per 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.

9. 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).

Requests should be made in writing to the Headteacher.

[Type here]

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.

10. RESPONSIBILITIES

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Sir William Ramsay School

The Business Manager will:

- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at the school is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. *NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by An Garda Síochána].*
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy

[Type here]

- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

11. COMPLAINTS

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