St Mary's Catholic Primary School

CCTV POLICY STATEMENT

Signed: Esther Bonnington.

May 2024

(based on Welsh Government &Local Authority guidance)

Learning and Loving

Caring and Sharing

through

The message of Christ

St Mary's Catholic Primary School is a happy community where we are loved and valued as individuals.

As Disciples of Jesus, we learn

together, pray together and

celebrate together as one in God's love.

Together with parents/carers, the parish and the wider community, we prepare our children to live and build God's kingdom on earth.

Introduction

St Mary's Catholic Primary School uses Closed Circuit Television (CCTV) systems within the school building and grounds. The system comprises of a number of fixed and dome cameras. The system does not have audio recording capability.
The system is owned and operated by the school in line with WCBC Code of Practice and Policy.

The CCTV is monitored centrally from the school office and is controlled by the School Secretaries.
This document along with the WCBC Code of Practice and Policy is designed to give clear guidelines on our use of CCTV and to protect the school and its CCTV operators from allegations of misuse of the system and to protect staff and the public from any abuse of the CCTV system.
Failure to comply with these documents could lead to disciplinary action, which may lead to dismissal and in certain circumstances criminal proceedings against the individuals concerned.

Legislation

In addition to Wrexham County Borough Council's policies, procedures, guidelines and Codes of Practice, CCTV and its operation are subject to legislation under:

- The Data Protection Act 2018 (DPA 2018).
- The Human Rights Act 1998 (HRA).
- The Freedom of Information Act 2000 (FOIA).
- The Regulation of Investigatory Powers Act 2000 (RIPA).
- The Protection of Freedoms Act 2012 (POFA)
- The General Data Protection Regulation 2016 (GDPR)

The school's CCTV system is registered with the Information Commissioner under the terms of the DPA 2018 and GDPR.

Objectives

St Mary's Catholic Primary School operates CCTV to:

- prevent or detect crime
- monitor the school buildings and grounds in order to provide a safe and secure environment for pupils, staff and visitors
- prevent loss or damage to school property.

Overall Responsibility
The governing body has overall responsibility for CCTV systems used within St Mary's School.
The Headteacher is the Data Controller and will be responsible for ensuring all users are kept up to date on legislation and changes in procedures. The Headteacher will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.

The Responsible Officer
The School Business Manager and Secretary are responsible for:

- ✓ The day-to-day operation of the CCTV system within their charge and the security and accountability of all equipment and media used by their system.

- ✓ Making sure that authorised staff using the CCTV system are properly trained in the use of the equipment and comply with the Code of Practice and policies and procedures. They are not to permit any other staff to operate the equipment or view images without authorisation.

- ✓ Acting as the first point of contact for enquires, complaints and requests for evidence and as the liaison officer for all external and internal contacts.

- ✓ Bring any faults or misuse of the equipment to the Headteacher's attention immediately.

Siting of CCTV Cameras
St Mary's Catholic Primary School is committed to respecting people's rights to privacy and supports the individual's entitlement to go about their lawful business. This is a primary consideration in the operation of any CCTV system, although there will inevitably be some loss of privacy when CCTV cameras are installed.

Cameras are sited so that they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated, restricting coverage to the school premises wherever possible.

Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring at any time.

Monitoring

Monitoring of cameras where required will only be carried out by persons authorised by the Headteacher.

It is not school policy to conduct 'covert monitoring' unless there are exceptional reasons for doing so, e.g. where there is good cause to suspect that an illegal or unauthorised action is taking place, or where there are grounds to suspect serious misconduct. In these circumstances authorisation must be obtained by the school Data Controller who would take advice from the Local Authority. Any covert monitoring must cease following completion of any investigation. Cameras for this purpose would not be used in any areas that are reasonably expected to be private, e.g. toilets / changing areas.

Viewing Images and the Provision of Evidence

The casual viewing or trawling of images is strictly forbidden. Viewings must only be undertaken for a specific, legitimate purpose. Enforcement agencies such as the police have a legal requirement to 'seize' any relevant evidence when investigating a crime and Responsible Officers must comply with their request. But the enforcement agencies are bound by the same rules as everyone else.

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.

All retained data will be stored securely at all times and permanently deleted as appropriate / required.

Signage

There is clear signage within the school grounds where CCTV is in use to comply with the Data Protection Act. 4

If 'Covert' cameras have been authorised for deployment, signage will not normally be erected.

Third Party Access Requests

Under the Data Protection Act, GDPR and the Freedom of Information Act, individuals have the right to request CCTV footage relating to themselves.

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. A fee of £10 may be charged per request.

Disciplinary Offences and Security

Tampering with or misuse of cameras, monitoring or recording equipment, images or recorded data by staff may be regarded as misconduct and could lead to disciplinary action, which may result in dismissal or criminal prosecution.

Any breach of this Policy Document or the CCTV Code of Practice will be regarded as a serious matter. Staff who are in breach of this instruction will be dealt with according to WCBC disciplinary procedures.

Inspections/Visits

All CCTV system may be subject to inspections or visits by a member of the Information Commissioners Office or the Regulation of Investigatory Powers Commissioner.

Health and Safety

The Headteacher is to ensure that staff are made aware of and comply with all Wrexham County Borough Council's policies on Health and Safety. In particular they are to be aware of policies relating to working with electrical equipment, VDU Regulations.

Complaints

Complaints about the operation of a CCTV system should be addressed initially to the Headteacher. Complaints will be dealt with in accordance with the school's complaints procedure.

Further Advice/ Information
Further advice on CCTV related matters may be obtained from the individuals and organisations shown below :

Legal Advice and RIPA from Legal Services,
Sioned Wyn Davies, Legal, Democratic & Registration Services Manager/Deputy Monitoring Officer.
Tel : 01978 268872
E-mail : Sioned.WynDavies@wrexham.gov.uk

Advice on issues affecting staff from the HR Department.
Andrea Watson HR Manager
Tel : 01978 297510
E-mail: andrea.stevenson@wrexham.gov.uk

Third Party Access Requests from Customer Services
Corporate Information Team.
Tel : 01978 292433
E-mail : foi@wrexham.gov.uk

Health and Safety advice from Departmental H&S Advisor.

Technical advice and training on individual systems from Systems Installer

Annexes:

A: Operational Assessment Form.

B: Privacy Impact Assessment Form.

Annex 'A' to the CCTV Policy.

Operational Requirements Review

CCTV System:_____ **Responsible Officer:**_____

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?	
03	Are the camera locations suitable for the task and do light levels or environmental issues such as tree growth affect them? (see attached Sheet)	
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?	
05	Are the cameras secure and protected from vandalism?	
06	Is the recording equipment and media in a secure area? Is access to this equipment and CCTV images restricted?	
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?	
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?	
09	Is there a comprehensive maintenance and cleaning regime in place?	
10	Do you have appropriate and sufficient signage in place to warn people that CCTV is in use?	
11	Is your Code of Practice on display so that members of staff and the public can read it?	
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?	

To be completed annually. One copy retained by the systems owner and a second copy sent to the SPOC

Additional Notes:

Name of Inspecting Officer:_____ **Signature**:_____
Date:_____

(Location):_____

By Camera

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

Annex ‘B’ to CCTV Policy Statement.
Dated June 2024

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?	
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?	
03	What are benefits to be gained by using CCTV?	
04	Can CCTV realistically deliver these benefits?	
05	Do you need to identify individuals or can you use a scheme not capable of identifying individuals?	
06	Can the system deliver the benefits now and in the future?	
07	What future demands will arise for wider use of the images and how will you cope?	
08	What are the views of those who will be under surveillance?	
09	How can you minimise intrusion of those who may monitored if specific concerns have been raised.	
10	Is the system established on a proper legal basis and operated within the law: DPA, HRA, RIPA and FOIA?	
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?	
12	Is the system justified in the circumstances?	
13	Is it proportionate to the problem it is designed to deal with?	
14	How has the capital and revenue cost been resolved?	

Over All Comments on Assessment:

Location of Scheme:_____

Name of Officer completing form:_____ **Signature**:_____

Date:_____