



## Morley Memorial Primary School

### CCTV Policy

Frequency of review:	Every 2 years
Reviewed:	Oct 2018
Reviewed By:	Tim Fox
Next review (date):	Mar 2020

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Morley Memorial Primary School (the **School**). It also serves as a notice and a guide to data subjects (including pupils, parents, employees, volunteers, governors, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **System**).

The System is administered and managed by the School, who act as the Data Controller. This policy will be subject to review every 2 years, and should be read with reference to the School's Data Protection Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here [link](#)).

All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.

The School's purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its

legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

### **Objectives of the System**

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To support the management of safeguarding on school grounds.
- To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders or vehicles.
- To provide evidence of damage or loss to the School's insurance company.
- To monitor the security and integrity of the School site and deliveries and arrivals.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's policies, which are available to parents and pupils on the School's website or on request.

### **Positioning**

- Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- No images of public spaces will be captured except to a limited extent at site entrances and around teaching buildings.

### **Maintenance**

- The CCTV System will be operational 24 hours a day, every day of the year.

- The company who installed the System will check and confirm that the System is properly recording and that cameras are functioning correctly on a regular basis.
- The System will be checked and (to the extent necessary) serviced regularly.

### **Supervision of the System**

- Employees authorised by the School to conduct routine supervision of the System may include the Site Manager, the Business Manager, the Office Manager and relevant staff on duty.
- Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

### **Storage of Data**

- The day-to-day management of images will be the responsibility of the Site Manager, or such suitable person as the Site Manager shall appoint in their absence.
- Images will be stored for the current and previous calendar month, and automatically overwritten unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded will be recorded and retained by the Site Manager in his office

### **Access to Images**

- Access to stored CCTV images will only be given to authorised persons, under the supervision of the Site Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy), including information held on the System, if it has been kept. The School will require specific details including at least to time, date and camera location

before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

- The Site Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the Site Manager may authorise access to CCTV images:
  - Where required to do so by the Headteacher, the Police or a relevant statutory authority;
  - To make a report regarding suspected criminal behaviour;
  - To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
  - To data subjects (or their legal representatives) pursuant to an access request under the Act;
  - To the School's insurance company where required in order to pursue a claim for loss or damage to insured property; or
  - In any other circumstances required under law or regulation.

Where images are disclosed as detailed above, a record will be made by the Site Manager including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

Where images are provided to third parties under the above rights, wherever practicable steps will be taken to obscure images of non-relevant individuals.

### **Other CCTV systems**

- The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy and/or its school rules.

- Many pupils travel on coaches provided by third party contractors and these coaches may be equipped with CCTV systems. The School may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.

### **Complaints and queries**

If you have any further questions about the School's CCTV system, or its use of CCTV, these should be referred to the Business Manager through the School office (01223 508786, office@morley.cambs.sch.uk)

## CCTV FOOTAGE ACCESS REQUEST

The following information is required before the School can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the School's CCTV system deletes recordings automatically prior to the beginning of the previous calendar month.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature\* ..... (must have parental responsibility if relating to a child at the school)

Print Name.....

Date .....