



## St Mary's School C A M B R I D G E

# CCTV Policy

*This policy is the responsibility of the IT Director.*

*Last review: October 2020*

*Next review: September 2021*

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## Rationale

This Policy regulates the management, operation and use of the closed-circuit television (CCTV) system used at St Mary's, Cambridge (the School). All cameras are owned by, and monitored within, the School and none are remotely operable. This policy follows Data Protection Act guidelines, and the School has regard to the ICO CCTV Code of Practice.

We use CCTV in order to:

- monitor and protect the School buildings and its equipment and contents.
- increase the safety of all our pupils, including our Early Years and Boarders, staff, peripatetic staff, volunteers, and visitors.
- assist in identifying offenders.

*Warning signs have been placed at all access routes to areas covered by the School CCTV.*

Materials or knowledge secured as a result of CCTV are not used for any commercial purpose. Video is only released to the media for use in the investigation of a specific crime and with the written authority of the Police.

The planning and design of the CCTV system gives maximum coverage, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

## Operation

The Scheme is administered and managed by the IT Director.

The CCTV system is operated 24 hours each day, every day of the year. The IT Department checks and confirm that the system is working effectively each working day.

Access to the CCTV system is strictly limited to the Deputy Head (Pastoral), the Bursar, the IT staff and the Health & Safety Manager. The CCTV system is securely password protected to avoid any access by unauthorised persons. If management becomes aware of any breach, the Head, Head of Juniors (or other

nominated senior member of staff) will investigate and take appropriate action, which may include disciplinary action.

We have notified the Information Commissioner that the School operates a CCTV system for the prevention and detection of crime and for the protection of pupils, staff and visitors. In accordance with the law, we do not use CCTV for any other purposes, nor provide images to any third party, save to law enforcement bodies. We conduct an annual audit and review of our use of CCTV, and display signs at our entrances warning of its usage.

The IT Director is trained in operating, recording and retaining images taken. He is aware of the procedure for handling requests for the disclosure of their own image by individuals (see below: Access to material).

## Monitoring Procedures

Camera surveillance is maintained at all times and the system will record when any movement occurs. A display monitor is located at reception which will show footage from cameras monitoring entry and exit points to the School. We keep CCTV footage for up to two weeks after which we overwrite or delete existing footage.

## Complaints

The School's Complaints Policy and Procedure should be used for dealing with any concerns about the School's CCTV system.

## Access to material

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the Bursar.

The School's Policy is:

- consider the request in light of the ICO CCTV Code of Practice (with particular reference to disclosure)
- subject to the above consideration and any refusal in light of this, to agree the request on production of a photograph or other suitable documentation which confirms the identity of the individual making the request.
- to consult the Information Commissioner where there is doubt about the request.

## Appendix: Requests for CCTV footage

### Requests from Police for CCTV footage

Should any images be required by the Police, we will (in normal circumstances) follow this protocol:

- The request must be in written form, specifying the date and time (as far as possible) of the image.
- The rank of the requesting officer must be Sergeant or higher.
- The School will endeavour to provide a response within 5 working days.
- If a decision is taken not to release the images, then the images in question must be held and not destroyed until all legal avenues have been exhausted.
- Images may be viewed by the Police for the prevention and detection of crime.
- A record will be maintained of the release of CCTV footage to the Police or other authorised applicants. A register will be available for this purpose.
- Viewing of CCTV footage by the Police must be recorded in writing and in the log book.
- CCTV footage will only be released to the Police on the clear understanding that it remains the property of the School, and the CCTV footage is to be treated in accordance with this Policy, the principles of the Data protection Act 2018 and the ICO Code of Practice. The School also retains the right to refuse permission for the Police to pass the CCTV footage or information about this to any other person.

The Police may require the School to retain the CCTV footage for possible use as evidence in the future. Such CCTV footage will be properly indexed and stored in the IT Office until it is needed by the Police.

### Requests from any other outside party

Applications received from outside bodies (e.g. solicitors) to view or release CCTV footage will be referred to the Head. In these circumstances CCTV footage will normally be released where satisfactory documentary evidence is produced showing that it is required for legal proceedings, a subject access request, or in response to a Court Order.

An administration fee may be charged depending on the circumstances.

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