

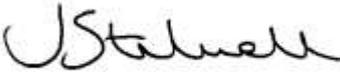


CCTV Policy

**INSPIRING BELIEF
in God and one another**



**ST RICHARD'S
SCHOOL**

DATE APPROVED BY THE LAT	May 2021
DATE APPROVED BY THE LAC	June 2021
REVIEW DATE	May 2023
Signed Headteacher	
Signed Chair of LAC	

Vision Statement

Our schools aspire to provide 'excellence and equity in a Christian context', where every child is valued as a unique individual treasured by a loving God. 'I have inscribed you on the palms of my hands.' Isaiah 49.v16.

Our aim is that every child will have the opportunity to flourish and develop into a rounded adult who can live life to the full. 'I have come that they may have life and may have it in all its fullness'. John 10.v10.

Our schools are places where all are welcome and where we practise kindness and hospitality on a daily basis.

Our vision and our values are clearly displayed and while it is not a requirement that a child and their family have to be practising Christians we do expect all parts of the community, children, staff, parents and carers to support the values that we hold dear.

In our school, we demonstrate how we support this vision through our values, which are Friendship, Endurance, Trust and Hope and summarised in the school's own vision statement: Inspiring belief in God and in one another.

The vision of St Richard's CE Primary School is for a thriving and outstanding school where children and adults, working with the local community, have the opportunity to become the best they can be.

Inspiring belief...

- in ourselves – through progression and fulfilment
 - in each other – through motivation and teamwork
 - in the children – through showing them their potential
 - in the parents – through building trust by results
 - in God to all – through our whole lives
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- We believe in looking out for everyone
We put safety first and we do all we can to ensure that all needs are met.
 - We believe in working together
We act like a family who support and motivate one another.
 - We believe in aiming for the best
We do all we can to ensure the highest quality in every area – our children deserve nothing less.
 - We believe in looking to the future
We are positive and seek opportunities to grow and improve, overcoming obstacles to achieve our goals.

We live out our values and vision through our key policies e.g. The LAT Behaviour policy is supported through the values described in the rewards and sanctions section of the policy demonstrating the importance of dignity and forgiveness.

The school admissions policy decided by the Local Academy Committee shows our inclusivity and the importance we place on service to our local community.

The breadth of the curriculum and the creative projects which we enjoy are key to providing opportunities for children to experience life in 'all its fullness', so that alongside learning and wisdom they also experience joy and delight in learning.

Care for the individual and their needs is crucial and the school's policies regarding inclusion and SEND are constant reminders that each of us is known to God and our names are 'inscribed on the palms of His hands'.

LAT HR policies are common in all schools and are created to ensure that individuals are treated fairly and with dignity. All HR policies have been scrutinised by the various unions to ensure that they contain acceptable procedures.

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Definitions

Term	Definition
'Board'	Refers to the Board of Directors of the Trust.
'CCTV'	Refers to Closed Circuit Television.
'CEO'	Refers to the Chief Executive Officer of the Trust.
'Consent'	Freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.
'Data Breach'	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data.
'Data Controller'	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of Processing of Personal Data.
'Data Processor'	A natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller, following the Controller's instructions.
'Data Subject'	The identified or identifiable individual whose Personal Data is held or processed.
'DBS'	Refers to the Disclosure and Barring Service.
'DPL'	Refers to data protection law, including the EU's General Data Protection Regulation, the Data Protection Act (as revised from time to time), case law, regulations, and statutory guidance.
'DPO'	Refers to the Data Protection Officer.
'HMRC'	Refers to Her Majesty's Revenue and Customs Office.
'ICO'	Refers to the Information Commissioners' Office.
'LAC'	Refers to the Local Academy Committees of the Trust.
'Personal Data'	Any information relating to an identified or identifiable natural or legal person (e.g. a Data Subject); an identifiable natural or legal person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as: <ul style="list-style-type: none">• A name;• An identification number;• Location Data;• An online identifier; and / or

- One or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural or legal person.

'Processing' Any operation, or set of operations, which is performed on Personal Data, or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processing can be automated or manual.

'Special Categories of Personal Data' Personal Data which is more sensitive and so needs more protection. Such data includes information about an individual's:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union memberships;
- Genetics;
- Biometrics (i.e. fingerprints, retinal or iris patterns), where used for identification purposes;
- Health (including physical and mental);
- Sexual history or sexual orientation; and / or
- History of offences, convictions or cautions*.

* Whilst criminal offences are not classified as 'sensitive data' within the Data Protection Act 2018, the Trust has included it within this policy as acknowledgement of the care needed with this data set.

'Trust' Refers collectively to the LDBS Academies Trust and the LDBS Academies Trust 2.

1. Aim

- 1.1. This Policy is based on guidance contained within the Data Protection Act 2018, the ICO's CCTV Code of Practice and the Human Rights Act 1998.
- 1.2. This Policy must be read in conjunction with the Trust's other Data Protection Policies.

2. Statement of use

- 2.1. The Trust uses CCTV within the premises of its schools. The purpose of this Policy is to set out the operation, use, storage, and disclosure of CCTV at the Trust's schools. This Policy applies to all Data Subjects whose image may be captured by the CCTV system.

- 2.2. The CCTV system is owned and operated by St Richard's CE Primary School and the deployment is determined by the school's leadership team in consultation with the DPO, the LAC and the Trust.
- 2.3. The school will:
- Notify the ICO of its use of CCTV as part of its registration.
 - Complete a data privacy impact assessment if amendments are to be made to the deployment or use of CCTV.
 - Treat the system and all information processed on the CCTV as 'processed' data.
 - Not direct cameras onto private property outside of the school grounds or an individual(s). The exception to this would be if prior or post authorisation was obtained for direct surveillance as set up by the Regulation of Investigative Powers Act 2000.
 - Display warning signs indicating the use of CCTV in prominent places (such as at all external entrances). The warning signs should include information on how to contact the school regarding information or access to the CCTV recordings.
 - Not guarantee that the CCTV system will be able to detect every single incident taking place in the areas that it covers.
 - Not use the CCTV data for any commercial purposes.

3. CCTV Coverage

- 3.1. The CCTV system at the school is comprised of 16 cameras, which record all the main entrances and exits into the school building and school site. There are also two internal cameras in the main office reception area. They record 24 hours a day.
- 3.2. Every effort has been taken to place cameras so that they only capture images required for the school to fulfil the purpose for which they have been installed.
- 3.3. As a general rule, the school does not install CCTV cameras inside classrooms, unless in exceptional circumstances.
- 3.4. Staff members can request the school to provide details of camera locations on the school premises.

4. Purposes

- 4.1. The school has installed the CCTV system to (1) provide a safe and secure environment for staff, pupils and visitors, (2) protect school premises, (3) assist in the prevention of / detection of illegal activity, and (4) assist the Police and other law enforcement agencies in apprehending suspected offenders.
- 4.2. The school may, on occasion, use its CCTV cameras to covertly investigate and validate suspicions relating to illegal activity or unauthorised behaviour / actions. In such instances, the school must seek authorisation from the (Executive) Headteacher and the Chair of the LAC. The school leaders must also be assured that informing the suspected individuals would seriously prejudice the reason for making any such recordings.

5. Storage of recordings

- 5.1. The school retains the CCTV footage for a period of 28 days. The CCTV footage can be accessed via the monitor kept in the school office. The CCTV records are stored digitally within the system.
- 5.2. Only authorised persons are able to view the live and historical CCTV feeds. Authorisation must be obtained directly from the (Executive) Headteacher prior to viewing the feeds.

6. Disclosure of images to Data Subjects

- 6.1. Any Data Subject has the right to request access to images recorded of themselves. These requests should be made to the Trust's Data Protection Officer (Grow Education Partners Ltd (responsible person is David Coy, david.coy@london.anglican.org). All requests must be made in writing in accordance with the Trust's Data Protection Policy.
- 6.2. When considering the release of the captured CCTV footage, the school must ensure that it does not violate the data protection rights of any other Data Subjects captured within the recording, unless consent has been obtained.
- 6.3. The Trust will only ever disclose the CCTV recordings to a third party where there is a lawful reason to do so. Any third party, including law enforcement agencies, must provide the school with a subject access request and the school must follow its subject access request protocols as per the Trust's Data Protection Policy.