

CCTV Policy 2021

Date adopted by the governing body	6 th October 2021
Date to be reviewed	October 2023
Signed: Chair of Governors	Many
Signed: Headteacher	Becky Reed

<u>Contents</u>

- 1. Introduction
- 2. Statement of Intent
- 3. Siting the Cameras
- 4. Covert Monitoring
- 5. Storage and Retention of CCTV images
- 6. Access to CCTV images
- 7. Subject Access Requests (SAR)
- 8. Access to and Disclosure of Images to Third Parties
- 9. Complaints
- **10.** Further Information
- **Appendix A Camera Positions**
- Appendix B CCTV Signage

1 Introduction

1.1 Chantry Community Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings and site in order to help provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

1.2 The system comprises a number of fixed and dome cameras.

1.3 The system does not have sound recording capability.

1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's Senior Leadership Team.

1.5 The CCTV is intermittently monitored centrally from the school offices by the Secretary and Business Manager.

1.6 Any proposed changes to CCTV monitoring will be subject to consultation with staff and the school community.

1.7 The use of CCTV and the associated images is covered by the Data Protection Act 2018 (DPA). This policy outlines the school's use of CCTV and how it complies with the Act.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the data controller (Headteacher) in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

2 Statement of Intent

2.1 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

2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B for an example). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

2.3 The planning and design has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.

3 Siting the Cameras

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

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor areas.

3.3 CCTV will not be used in classrooms but, in exceptional cases, the Senior Leadership Team will consider the use of CCTV in areas within school that have been identified by staff and pupils as not being easily monitored.

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

4.4 Cameras will not be sited in areas which are reasonably expected to be private, for example toilet cubicles.

4 Storage and Retention of CCTV images

4.1 Recorded data will not be retained for longer than is necessary and will be retained in line with the school retention schedule. 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.

4.2 All retained data will be stored securely.

5 Access to CCTV images

5.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

6 Subject Access Requests (SAR)

6.1 Individuals have the right to request access to CCTV footage relating to themselves under the DPA.

6.2 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.

6.3 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, or where another exemption applies under the DPA.

6.4 The school will seek advice from its data protection officer (DPO) when dealing with SARs.

7 Access to and Disclosure of Images to Third Parties

7.1 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).

7.2 Requests should be made in writing to the Headteacher.

7.3 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.

7.4 Advice will be sought from the school DPO where necessary.

8 Complaints

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

9 Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2017(published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- •

Appendix A – Camera Positions

Camera No	Camera View
1	Front office (internal)/ Front Entrance (external)
2	Front of school
3	Car park
4	Rear play area

Appendix B - CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that images are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign(s) should include the following:

- That the area is covered by CCTV and images are recorded.
- The purpose of using CCTV.

