



CLOSED CIRCUIT TV POLICY

(CCTV)

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Policy confirmed by the Governing Body of The Grove Primary School on:

Date: September 2016

To be reviewed: September 2020

Objectives of the CCTV system

- To protect the school buildings and assets of the school.
- To increase personal safety and reduce the fear of crime.
- To support the Police in a bid to deter and detect crime.
- To assist in managing the school.

1. Introduction

- 1.1 The Grove Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to 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 cameras.
- 1.3 The system has two cameras with sound recording capability that are located in the main entrance foyer and the cookery room.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- 1.5 The CCTV is monitored centrally by the site manager.
- 1.6 Changes to CCTV monitoring will be subject to consultation with staff and the school community.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the General Data Protection Regulation 2018. The use of CCTV, and the associated images and any sound recordings is covered by the General Data Protection Regulation 2018. 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 and sound. All operators are trained by Cambridgeshire County Council 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 and sound.

2 Statement of Intent

- 2.1 The CCTV system will be registered with the Information Commissioner under the terms of the General Data Protection Regulation 2018 and will seek to comply with the requirements both of the above Act and Commissioner's Code of Practice.
- 2.2 The school will treat the system and all information, documents and recordings obtained and used, as data which are protected by the General Data Protection Regulation 2018
- 2.3 The system installed is compliant with the General Data Protection Regulation 2018, Human Rights Act and Regulatory Investigation Powers Act.

- 2.4 Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school and its staff, students and visitors.
- 2.5 Cameras are focussed on the school buildings and around entrances/exits.
- 2.6 Materials of knowledge secured as a result of CCTV will not be used for any commercial purpose. Information transferred to CD/DVD (or other appropriate media) will only be used for the investigation of a specific crime or incident. Release to the media would only be allowed with the written authority of the police if this was required by them as part of a police investigation.
- 2.7 Warning signs, as required under the General Data Protection Regulation 2018, have been placed at key points in the building.

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 General Data Protection Regulation 2018.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 3.3 CCTV will not be used in classrooms but may in the future be used 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, except for cameras placed for the purpose of covert monitoring.

4 Storage and Retention of CCTV images

- 4.1 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.
- 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 General Data Protection Regulation 2018.

- 6.2 All requests should be made in writing to the Headteacher. The request should provide as much information as possible to enable the school to find the images including date, time and location. If the Data Subject is unknown to the school, then a photograph of the individual and/or a description of what they were wearing at the time they believe they were caught on the system may be requested in order to aid identification.
- 6.3 The school will respond to requests within 40 calendar days of receiving the written request and fee.
- 6.4 A fee of £10 will charged per request.
- 6.5 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.

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.

8. Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher in order for the Headteacher to take the appropriate disciplinary action.

9 Complaints

- 9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance. Complaints will be investigated in accordance with the ICO Code of Practice.

Further Information

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

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- General Data Protection Regulation 2018

Appendix A - Checklist

This CCTV system and the images produced by it are controlled by the site manager who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

The Grove Primary School has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of stakeholders it will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	September 2016		September 2019
There is a named individual who is responsible for the operation of the system.	✓		
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	✓		
Cameras have been sited so that they provide clear images.	✓		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	✓		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	✓		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	✓		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	✓		
Except for law enforcement bodies, images will not be provided to third parties.	✓		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	✓		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	✓		

Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

