

CCTV Policy

Low Ash Primary School



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| Approved by: | The Governing Body | Date 20.11.19 |
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1. Statement of intent

1. At Low Ash Primary, we take our responsibility towards the safety of staff and pupils very seriously. To that end, we use Closed Circuit Television (CCTV) cameras to monitor the members of our school in a very specific way.
2. The purpose of this policy is to manage and regulate the use of the CCTV system at the school and ensure that:
3. We comply with the Data Protection Act 1998.
4. The images that are captured are useable for the purposes we require them for.
5. We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.
6. CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the School is intended for the purposes of:
 - 6.1. protecting the School buildings and school assets, both during and after school hours;
 - 6.2. promoting the health and safety of staff, pupils and visitors as well as for monitoring student behaviour;
 - 6.3. preventing bullying;
 - 6.4. reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
 - 6.5. supporting the police in a bid to deter and detect crime;
 - 6.6. assisting in identifying, apprehending and prosecuting offenders; and
 - 6.7. ensuring that the School rules are respected so that the School can be properly managed.
7. 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 made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. Legal framework

1. This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.
2. The Code of Practice is published at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>
3. CCTV warning signs will be clearly and prominently placed at the main external entrance to the School. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the School will ensure that there are prominent signs placed within the controlled area.
4. CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the School, including Equality & Diversity Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual

Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

5. This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.
6. Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.
7. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the School or a student attending the School.
8. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the School. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018

3. Location of cameras

1. The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as 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 the images captured comply with the legislation.
2. School will make every effort to position the cameras so that their coverage is restricted to the School premises, which includes both indoor and outdoor areas.
3. CCTV will not be used in classrooms but in limited areas within the School that have been identified by staff and pupils as not being easily monitored.
4. Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras place for the purpose of covert monitoring.
5. CCTV Video Monitoring and Recording of Public Areas may include the following:
 - 5.1. Protection of school buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
 - 5.2. Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
 - 5.3. Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
 - 5.4. Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
 - 5.5. Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance

4. Protocols

- 1.1. The CCTV system will be registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 1998.
- 1.2. The system will comply with all additional legislation including:
 - The Commissioner's Code of Practice for CCTV 2008.
 - The Surveillance Camera Code of Practice 2013, published by the Home Office.
- 1.3. The CCTV system is a closed digital system which does not record audio.
- 1.4. Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the Code of Practice of the Information Commissioner.

- 1.5. The CCTV system has been designed for maximum effectiveness and efficiency. However, the school cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.
- 1.6. The CCTV system will not be trained on individuals unless an immediate response to an incident is required.
- 1.7. Additionally, the CCTV system will not be trained on private vehicles or property outside the perimeter of the school.
- 1.8. Recordings will only be released following a written request from the police, or in respect of a subject access request.

5. Security

- 1.9. Access to the CCTV system, software and data will be strictly limited to authorised operators and will be password protected.
- 1.10. Our authorised CCTV system operators are:
 - J Byrne, Site Manager

Our authorised personnel allowed to view images are:

 - any member of the Senior Leadership Team (SLT)

- 1.11. The main control facility is kept secure and locked when not in use.
- 1.12. If covert surveillance is planned, or has taken place, copies of the authorisation forms will be completed and retained.
- 1.13. Camera systems will be properly maintained at all times.
- 1.14. Visual display monitors are located in the in the main office and the site manager's office.

6. Privacy

- 1.15. Live and recorded materials will only be viewed by authorised operators and authorised personal for the purpose of investigating incidents.
- 1.16. Images may be released to the police for the detection of crime under section 29 of the Data Protection Act 1998.
- 1.17. Viewings of images by the police will be recorded in the log.
- 1.18. Applications received from external bodies (e.g. solicitors) to view or release images will be referred to the Headteacher.
- 1.19. In circumstances where external bodies make requests to view or release images, the Headteacher will release them, provided satisfactory documentary evidence is produced to show that they are required for:
 - Legal proceedings.
 - A subject access request.
 - Responding to a court order.

1.20. Images will only be retained for as long as they are required. The system will automatically delete recordings after 31 days in accordance with the Data Protection Act 1998.

7. Code of practice

1.21. We have a CCTV surveillance system for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, students and visitors.

1.22. The system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel only.

1.23. The school will ensure that the CCTV system is used to create a safer environment for staff, students and visitors to the school, and to ensure that its operation is consistent with the obligations outlined in the Data Protection Act 1998. The policy is available from the school's website.

1.24. The system will:

- Only be used for the purpose specified, which is in pursuit of a legitimate aim.
- Be designed to take into account its effect on individuals and their privacy and personal data.
- Be transparent and include a contact point through which people can access information and submit complaints.
- Have clear responsibility and accountability procedures for images and information collected, held and used.
- Have defined policies and procedures in place which are communicated throughout the school.
- Only keep images and information for as long as required.
- Restrict access to retained images and information with clear rules on who can gain access
- Consider all operational, technical and competency standards, relevant to a system and its purpose, and work to meet and maintain those standards in accordance with the law.
- Be subject to stringent security measures to safeguard against unauthorised access.
- Be regularly reviewed and audited to ensure that policies and standards are maintained.
- Only be used for the purposes for which it is intended, including supporting public safety, protection of pupils and staff, and law enforcement.
- Be accurate and well maintained to ensure information is up-to-date.

8. Access

1.25. Requests for access will be handled in accordance with our Data Protection Policy.

1.26. All disks containing images belong to and remain the property of the school.

1.27. Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings, will be assessed by the Headteacher on a case-by-case basis with close regard to data protection and freedom of information legislation.

1.28. It is important that access to, and disclosure of, the images recorded by CCTV is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

1.29. Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:

- The police – where the images recorded would assist in a specific criminal inquiry
- Prosecution agencies – such as the Crown Prosecution Service (CPS)
- Relevant legal representatives – such as lawyers and barristers
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of the Data Protection Act 1998 and the Freedom of Information Act 2000

1.30. Requests for access or disclosure will be recorded and the Headteacher will make the final decision as to whether recorded images may be released to persons other than the police.

9. Monitoring and review

1.31. The Headteacher will be responsible for reviewing this policy every 3 years, or earlier if there is a change in legislation.

Signed Chair of Governors