



Bredenbury Primary School

CCTV POLICY

Date Produced	December 2020
Original Author	Samantha Smith DPO
Version	1.0
Review Due	December 2022
Updated	N/A
Reviewer	Samantha Smith
Date Ratified by Governors	January 2021

Document Control

This is a CONTROLLED document and updates or changes to this document are authorized and then advised by meeting, email, website or newsletter as appropriate.

It is UNCONTROLLED when printed. You should verify that you have the most current issue.

DOCUMENT HISTORY

Document Log

Version	Status	Date Issued	Description of Change	Pages affected	Review
0.1	Ratified	January 2021			

Contents

Introduction	3
Statement of Intent	3
Legal Framework.....	4
Definitions.....	4
Siting the Cameras	4
Storage and Retention of CCTV images	5
Access to CCTV images.....	5
Subject Access Requests (SAR)	5
Access to and Disclosure of Images to Third Parties	5
Monitoring and review	6
Complaints	6

Introduction

At Bredenbury Primary School, we take our responsibility towards the safety of staff, visitors and pupils very seriously. The school uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment and to prevent the loss or damage to school property.

The system comprises a number of fixed cameras some of which do have sound recording capability.

This policy covers the use of CCTV and surveillance systems which capture moving and still images of people who could be identified, as well as information relating to individuals for the purpose of the prevention and detection of crime, safeguarding and behaviour management.

Cameras will be used to monitor activities within the school, including classrooms and playground. The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

The CCTV is monitored centrally by the Head of School and School Administrator. The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 ("the Act"). The use of CCTV, and the associated images and recordings is covered by the Act. This policy outlines the school's use of CCTV and how it complies with the Act.

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 in their responsibilities. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

Statement of Intent

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>

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

The school will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose

Warning signs, as required by the Code of Practice of the Information Commissioner has been placed in classrooms with cameras, as well as access routes covered by the school CCTV

Legal Framework

This policy has due regard to legislation including, but not limited to, the following:

- The General Data Protection Regulation 2016
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended)
- The Freedom of Information and Data Protection Regulations 2004
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012

This policy has been created with regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'

This policy operates in conjunction with the following school policies:

- Data Protection Policy
- E-security Policy

Definitions

For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:

Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage.

Overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.

Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance.

Bredenbury Primary School does not condone the use of covert surveillance when monitoring the school's staff, pupils and/or volunteers.

Any overt surveillance equipment will be clearly signposted around the school.

Siting the Cameras

Cameras are sited so that 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 and the relevant legislation is complied with. The school will make every effort to

position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will be used in corridors, stairs and outside areas, which are areas within school that have been identified as not being easily monitored.

Storage and Retention of CCTV images

All surveillance footage & audio recordings will be kept for 8 days for security purposes; the headteacher, acting on behalf of the school is responsible for keeping the records secure and allowing access. If footage or audio is used for an investigation, it will be kept for a maximum of 6 months or potentially longer if legal proceedings follow.

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.

Access to CCTV images

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

The school's authorised CCTV system operators are:

- Headteacher
- DPO
- School Administrator/Security Attendant
- Caretaker

Subject Access Requests (SAR)

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

All requests should be made in writing to Bredenbury Primary School. 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.

The school will respond to requests within 30 calendar days of receiving the written request and fee.

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.

Access to and Disclosure of Images to Third Parties

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).

Requests should be made in writing to the DPO Mrs S Smith

igschools@herefordshire.gov.uk

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.

Monitoring and review

The CCTV system and equipment will be regularly checked to ensure that it is working properly and that it is producing high quality images.

This policy will be monitored and reviewed on an annual basis by the DPO and the headteacher.

The DPO and Head of School will be responsible for monitoring any changes to legislation that may affect this policy, and make the appropriate changes accordingly.

The DPO and Head of School will communicate changes to this policy to all members of staff.

The scheduled review date for this policy is December 2021.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the DPO in the first instance. igschools@herefordshire.gov.uk