John Perry Primary School

CCTV Policy

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Version	Date	Author	Description of Change
1	29/08/18	Data Protection Enterprise www.dataprotectionenterprise.co.uk	New Policy
2	01/08/19	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Amendments to: S1 Purpose – Point 2 amended S4 Covert Monitoring – added S5 Amendment to retention of CCTV images S8 Addition of 8.2
3	21/09/20	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Annual Review S7.4 amended to read one calendar month S 12 added – Links with other policies
4	20/01/2022	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Policy Review. Amendment to:-GDPR 2016/679 to UK GDPR
5	01/08/2023	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Policy Review. Amendments to:- S7.2 added 'requests may be made via social media or verbally' 8.1 amended 'reasonable to reasonably'
6	01/08/2024	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	Policy Review. Amendment to: S1 – bullet point 2 S1 - Home Office CCTV Guidance S2 – Paragraph 2 amended Appendix A deleted

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1. PURPOSE

The Purpose of this policy is to regulate the management, operation, and use of the CCTV system (Closed Circuit Television) at John Perry Primary School, hereafter referred to as 'the School'.

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:

- protecting the School buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the School rules are respected so that the School can be properly managed.

The system does not have sound recording capability or Facial Recognition Technology (FRT).

The CCTV system is owned and operated by the School, the deployment of which is determined by the School's leadership team.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the School community.

The School's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

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 Home Office Surveillance Camera Code of Practice.

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

2. SCOPE

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 CCTV guidance to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at the main external entrance to the School. In areas where CCTV is used, the School will ensure that there are prominent signs placed within the controlled area.

The planning and design have endeavored to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

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.

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.

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.

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.

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

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.

The 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.

CCTV will not be used in classrooms unless required by law, but in limited areas within the School that have been identified by staff and pupils as not being easily monitored.

Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- ***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
- ***Monitoring of Access Control Systems:*** Monitor and record restricted access areas at entrances to buildings and other areas
- ***Verification of Security Alarms:*** Intrusion alarms, exit door controls, external alarms

- ***Video Patrol of Public Areas:*** Parking areas, Main entrance/exit gates, Traffic Control
- ***Criminal Investigations (carried out by the police):*** Robbery, burglary and theft surveillance

4. COVERT MONITORING

The School retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or serious unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct.
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained beforehand from the Headteacher and Chair of Governors.

Covert Monitoring may take place in classrooms when circumstances as above are satisfied. Covert Monitoring used in classrooms will never be used to observe or assess a teacher's professional performance, or to contribute to capability proceedings.

Covert Monitoring will cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

5. STORAGE AND RETENTION OF CCTV IMAGES

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than 31 days an electronic file held on a secure central server where specific CCTV image/recordings are retained will be kept. The Data Protection Act and UK GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the School's purposes for recording information, and how long it is needed to achieve this purpose.

The School will store data securely at all times.

6. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7. SUBJECT ACCESS REQUESTS (SAR)

7.1 Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the UK GDPR.

7.2 All requests should be made in writing, however, requests may also be made via social media and verbally but this is not recommended to the Data Protection Officer who can be contacted by email dpo@johnperry.bardaglea.org.uk Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date, and location.

7.3 The School does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.

7.4 The School will respond to requests within one calendar of receiving the request but if a request is received outside of the School term this may not be possible.

7.5 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.

8. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

8.1 There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the School where these would reasonably need access to the data (e.g. investigators).

8.2 If an order is granted by a Court for disclosure of CCTV images, then this will be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

8.3 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.

9. RESPONSIBILITIES

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the School.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.

- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the School and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

10. DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY BY DESIGN

CCTV has the potential to be privacy intrusive. The School will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

11. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

12. LINKS WITH OTHER POLICIES

This CCTV policy is linked to the School:

- Data Protection Policy
- Freedom of Information Policy
- Information Sharing Policy
- Data Protection Impact Assessment Policy
- Information Security Policy
- Acceptable use policy
- Safeguarding policy
- Privacy Notices

The Information Commissioner also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk