

Policy on the use of Closed Circuit
Television (CCTV)



Management log

Document name	Policy on the use of Closed Circuit Television (CCTV)
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Date approved	September 2022
Date issued	September 2022
Date of review	August 2023
Reviewer	Director of IT

Document history

Version	Date authored	Author	Date approved	Date issued
V1	January 2018	Alison Ingram	March 2018	April 2018
V2	Aug 2020	Alison Ingram	September 2020	September 2020
V2.1	Aug 2021	Director of IT	September 2021	September 2021
V3	Aug 2022	Director of IT	September 2022	September 2022

1. Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- Support the Safeguarding of the school community
- To assist in the defence of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms)
- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989 □ The Children Act 2004
- The Equality Act 2010

2.2 Guidance

- Surveillance Camera Code of Practice (2021)

3. Definitions

- Surveillance: the act of watching a person or a place
- CCTV: closed circuit television; video cameras used for surveillance
- Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance
- GDPR Lead: Data Protection Officer and Data Protection Champion

4. Covert surveillance

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed, the proper authorisation forms will be completed and retained.

5. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

Cameras are located in:

Camera Name	Floor
D1	Right Hand Side Back
D2	Community Ent
D3	Rear Right
D4	Football Pitch
D5	Front Right Hand side
D6	Front Side RHS
D7	Bin Storage Area
D8	Community Play Gnd
D9	Reception
D10	2ND Floor Corridor 1 C
D11	Gnd Adj Stairs 2
D12	2ND Floor C Corridor 2
D13	1ST Floor ADJ Strair's 2
D14	1ST Floor Corridor B
D15	Gnd Stairs 2
D16	Gnd Toilet Lobby
D17	Gnd Female Toilets
D18	Female Changing Room Lobby
D19	1ST Floor Corridor B 2
D20	Community Reception
D21	1ST Floor Stairs 3
D22	1ST Floor Balcony
D23	Canteen On Wall
D24	1ST Floor Lady's Loo
D25	Libary Left Hand Side
D26	Gnd Floor Corridor A
D27	2ND Floor Gent's Loo
D28	1ST Floor Gents Loo
D29	2ND Floor Corridor
D30	1ST Floor Stairs 1
D31	2ND Floor Corridor C
D32	2ND Floor Lady's Loo
D33	Libary Right Hand Side
D34	ADJ Stairs 2
D35	Canteen Serveing Area

D36	Gnd Floor Outside Server
D37	Gnd Floor Gents Loo
D38	Dance Studio
D39	Ground's Keeper ADJ Strais 1
D40	1st Floor Opposite Balcony

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system
- Identifies the school as the data controller
- Provides contact details for the school

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

6. Roles and responsibilities

Add to/amend this section according to how your school has divided up responsibilities.

6.1 The governing board

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

6.2 The Business and Operations Manager / School Business

Manager The individual will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the GDPR Lead to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training from the GDPR Lead in the use of the system and in data protection

- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the GDPR Lead and taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties

6.3 The GDPR Lead

The GDPR Lead will:

- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection
- Train all staff to recognise a subject access request
- Deal with subject access requests in line with the Freedom of Information Act (2000)
- Monitor compliance with UK data protection law
- Advise on and assist the school with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office
- Conduct data protection impact assessments
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Ensure footage is destroyed when it falls out of the retention period
- Keep accurate records of all data processing activities and make the records public on request
- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period
- Receive and consider requests for third-party access to CCTV footage

6.4 The system manager

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

7. Operation of the CCTV system

The CCTV system will be operational 24 hours a day, 365 days a year.

The system is registered with the Information Commissioner's Office.

The system will not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

8. Storage of CCTV footage

Add to/amend this section according to your own procedures and system specifications.

Footage will be retained for 31 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 31 days, for example where a law enforcement body is investigating a crime or to fulfil a Safeguarding requirement, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and secured, so that it can be used as evidence if required.

The GDPR Lead will carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period.

9. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

9.1 Staff access

The following members of staff have authorisation to access the CCTV footage:

Strategic Leadership Team
BOM
Site Manager

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

9.2 Subject access requests (SAR)

According to UK GDPR and DPA 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving the request the school will immediately issue a receipt and will then respond within 30 days during term time. The school reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.

All staff have received training to recognise SARs. When a SAR is received staff should inform the DPO in writing. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the ICO website.

9.3 Third-party access

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the Head Teacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose, and seek legal advice if necessary.

The GDPR Lead will ensure that any disclosures that are made are done in compliance with UK GDPR.

All disclosures will be recorded by the GDPR Lead.

10. Data protection impact assessment (DPIA)

The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including the replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.

The DPO will provide guidance on how to carry out the DPIA. The DPIA will be carried out by the Business and Operations Manager

Those whose privacy is most likely to be affected, including the school community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be done annually and/or whenever cameras are moved, and/or new cameras are installed.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

11. Security

- The system manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults once a term
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

12. Complaints

Complaints should be directed to Business and Operations Manager and should be made according to the school's complaints policy.

13. Monitoring

The policy will be reviewed annually by the school to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

14. Other Policies

The following policies should be viewed in conjunction with this document:

- Data protection policy
- Biometric data policy
- Privacy notices for parents, pupils, staff, governors and suppliers
- Safeguarding policy
- Data retention policy

Appendix 3 - The guiding principles of the Surveillance Camera Code of Practice

System operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against reference database for matching purposes should be accurate and kept up to date.