

# **Broad Chalke Primary School**

## **CCTV Policy**

With the love of God we learn, care, grow and share

### **Introduction**

- 1.1. Broad Chalke Primary School uses closed circuit television (CCTV) images to monitor the main entrances to the school 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 of two fixed cameras at the front of the school.
- 1.3. The system does not have sound recording capability.
- 1.4. The CCTV system is owned and operated by the school, the deployment of which is determined by the Governing Body.
- 1.5. The CCTV is monitored centrally from the server room with delegated responsibility to the Headteacher (Mrs Amanda Brockway) and the School Business Manager (Mrs Andi Chalk).
- 1.6. The CCTV system will be serviced annually by Wessex Fire and Security.
- 1.7. The introduction of, or changes to CCTV monitoring will be subject to consultation with the Governing Body and the school community.
- 1.8. The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.9. 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 authorised operators and employees are aware of their responsibilities under the CCTV Code of Practice and are aware of the restrictions in relation to access to, and disclosure of recorded images.

### **Statement of Intent**

- 2.1. 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/for-organisations/guide-to-data-protection/cctv/>

- 2.2. CCTV warning signs will be clearly and prominently placed at all external school gates. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- 2.3. 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.

### **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 Data Protection Act.

- 3.2. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which include outdoor areas.
- 3.3. CCTV will not be used inside the school.

### **Storage and Retention of CCTV images**

- 4.1. The CCTV system will be operated 24 hours each day, every day of the year.
- 4.2. Recorded data is stored on a stand alone hard drive with a record time of 14 days, after this time data is overwritten automatically.
- 4.3. Where data retention is needed beyond 14 days, CCTV footage can be copied to external USB memory storage. 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.
- 4.4. All retained data will be properly indexed, recorded on a register and stored securely.

### **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.
- 5.2. Viewing of recorded images must take place in a restricted area with controlled access.
- 5.3. Access to recorded data requires individual logins and is password protected.

### **Subject Access Requests (SAR)**

- 6.1. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 6.2. All requests should be made in writing to the Headteacher. 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.
- 6.3. The school will respond to requests within one month of receiving the written request. All requests will be recorded on a register.
- 6.4. 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**

- 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. All requests will be recorded on a register.
- 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.

## **Complaints**

8.1. Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

## **Further Information**

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

A data protection code of practice for surveillance cameras and personal information<sup>6</sup> (published by the Information Commissioners Office)

<https://ico.org.uk/for-organisations/guide-to-data-protection/cctv/>

Regulation of Investigatory Powers Act (RIPA) 2000

<https://www.legislation.gov.uk/ukpga/2000/23/contents>

Data Protection Act 1998

<http://www.legislation.gov.uk/ukpga/1998/29>

Policy Ratified by the Governing Body: November 2017

Next Review Date: April 2020

## Appendix A - Checklist

This CCTV system and the images produced by it are controlled by the Headteacher and School Business Manager who are 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 1998).

Broad Chalke Primary School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of pupils, staff and visitors. It will not be used for other purposes. We conduct a regular review of our use of CCTV.

	Checked
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes
There is a named individual who is responsible for the operation of the system.	Yes
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.	Yes
Cameras have been sited so that they provide clear images.	Yes
Cameras have been positioned where possible to avoid capturing the images of persons not visiting the premises.	Yes
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).	Yes
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes
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.	Yes
Except for law enforcement bodies, images will not be provided to third parties.	Yes
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.	Yes
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes

## 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