



# CCTV Policy



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APPROVED – MAY 2018  
REVIEW – MAY 2021  
PERSON RESPONSIBLE – DATA PROTECTION OFFICER

## **INTRODUCTION**

Closed Circuit Television Systems (CCTVS) are installed in Hillside Primary School (“the School”). Their operation will be reviewed regularly in consultation with staff, the governing body, parents/carers and pupils.

### **1. PURPOSE OF POLICY**

**The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of the School.**

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing the 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:

- promoting the health and safety of staff, pupils and visitors;
- protecting the school buildings and school assets, both during and after school hours;
- 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.

### **2. SCOPE**

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

### **3. GENERAL PRINCIPLES**

The School as the corporate body has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, pupils and invitees to its premises. The School owes a duty of care under legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

Information obtained through the CCTV system may only be released when authorised by the Headteacher, following consultation with the Chair of Governors. Any requests for CCTV recordings/images from the Police will be fully recorded and legal advice will be sought if any such request is made (see “Access” below).

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the School, including the Equality Policy, Complaints Policy and other

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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 one of its schools/centres.

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 Data Protection Act 1998 and the General Data Protection Regulation ("Relevant Legislation").

#### **4. JUSTIFICATION FOR USE OF CCTV**

Relevant Legislation requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that the School needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the governing body. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

**CCTV systems will not be used to monitor normal teacher/student classroom activity in school.**

In other areas of the school where CCTV has been installed, e.g. main reception, the Headteacher has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues.

#### **5. LOCATION OF CAMERAS**

The location of cameras is a key consideration. The School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

The CCTV Video Monitoring and Recording of areas in the School include the following:

- School buildings and property: The building's perimeter, entrances and exits, main reception, receiving areas for goods/services, Early Years, KS1 and Wolves cloakrooms, Dance Studio
- 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 of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control

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## 6. COVERT SURVEILLANCE

The School will not engage in covert surveillance.

## 7. NOTIFICATION – SIGNAGE

The Headteacher will provide a copy of this CCTV Policy on request to staff, pupils, parents and visitors to the school. Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to the School property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.



**WARNING**

**CCTV cameras in operation**

**Images are being monitored and recorded for the purposes of the health, safety and well-being of the whole school community and the protection of school premises and assets as well as crime prevention.**

**This scheme is controlled by Hillside Primary School.**

**For more information, call 01484 226834**

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area
- at or close to each camera

## 8. STORAGE & RETENTION

Relevant Legislation states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. Accordingly, the images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation of that issue.

The images/recordings will be stored on the hard drive of the CCTV system computer in the main office at the school which is locked out of school hours. A log of access is automatically generated when past recordings are viewed. No other copies of CCTV data are kept or stored anywhere else in the school.

## 9. ACCESS

Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Data Protection Officer. The Headteacher may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals

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may include members of the School's Leadership Team, administration officers, other members of the teaching staff, representatives of the Local Authority, representatives of any relevant insurance companies, the Police and/or a recorded pupil or the parent of a recorded pupil). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Automatic logs of access to the images will be created.

**Access requests:** On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing to the Data Protection Officer. The School may charge up to £10.00 for responding to such a request and must respond **within 40 days**.

A person should provide all the necessary information to assist the School in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the School.

In giving a person a copy of their data, the School will provide a disk or USB stick with relevant images. However, other images of other individuals will be obscured before the data is released.

## **10. RESPONSIBILITIES**

The Data Protection Officer will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the School
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the School
- Ensure that the CCTV monitoring at the School 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
- Ensure the maintenance of a record of access to any material recorded or stored in the system
- Ensure that monitoring recordings 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 pupils 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 adequate signage at appropriate and prominent locations is displayed as detailed above
- 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"

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- Ensure that recordings are stored in a secure place with access by authorised personnel only
- Ensure that recordings are stored for a period not longer than 30 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 Chair of Governors.
- 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

#### **11. SECURITY COMPANIES**

The school CCTV system is owned by the school and maintained by a security company contracted by the School. The School has a written contract with the security company in place which details the maintenance of the system. The security company has no access to the data and is therefore not a "Data Processor" under the Relevant Legislation.

#### **12. REVIEW & MONITORING**

The policy will be reviewed, monitored and evaluated regularly by the Data Protection Officer. On-going review and evaluation will take cognisance of changing information or guidelines, legislation and feedback from parents/guardians, pupils, staff and others.

## APPENDIX 1 - DEFINITIONS

### **Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;**

**CCTV** – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images are then be recorded on a digital recording mechanism.

**Data** - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

**Personal Data** – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

**Access Request** – this is where a person makes a request to the organisation for the disclosure of their personal data under Relevant Legislation.

**Data Processing** - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

**Data Subject** – an individual who is the subject of personal data.

**Data Controller** - a person who (either alone or with others) controls the contents and use of personal data.

**Data Processor** - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. Relevant Legislation places responsibilities on such entities in relation to their processing of the data.

## APPENDIX 2 - PRIVACY IMPACT ASSESSMENT

In drawing up this Policy, the School has conducted a Privacy Impact Assessment asking the following questions:

- What is the School's purpose for using CCTV? What are the issues/problems it is meant to address?
- Is the system necessary to address a pressing need, such as safety or crime prevention?
- Should the CCTV cameras operate on the outside of the premises only or inside as well?
- Is it justified under the circumstances?
- Is it proportionate to the problem it is designed to deal with?
- What are the benefits to be gained from its use?
- Can CCTV systems realistically deliver these benefits? Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?
- Does the School need images of identifiable individuals, or could the system use other images which are not capable of identifying the individual?
- Will the system being considered deliver the desired benefits now and remain suitable in the future?
- What future demands may arise for wider use of images and how will they be addressed?
- What are the views of those who will be under CCTV surveillance?
- What could be done to minimise intrusion for those whose images may be captured, particularly if specific concerns have been expressed?
- How have staff, pupils and visitors been assured by the School that they will not be monitored and that the CCTV system will be used only for the stated purposes?
- Does the school's policy on the use of CCTV make it clear that staff (teaching and non-teaching) will not be monitored for performance or conduct purposes?
- Have the views of staff & pupils regarding the location of cameras been taken into account?
- Can the location of each camera be justified in accordance with the overall purpose?
- Has appropriate signage been erected at the location of each camera indicating that recording is taking place and outlining the purpose of such recording?
- What security measures are in place to protect the CCTV system and recordings/images?
- Who will have access to the system and recordings/images, and are those who have authorised access clear about their responsibilities?
- Are the camera monitors kept out of view of staff, pupils and visitors and is access to the camera monitors restricted to a limited number of staff on a 'need to know' basis?
- Is the room(s) which houses the camera monitors and the CCTV system securely locked when unattended?
- Does the School have a procedure in place to ensure that recordings/images are erased or deleted as soon as the retention period (30 days) has expired?
- Will appropriate notices be in place to ensure that individuals know that they are being monitored?
- Does the School have a procedure in place to handle access requests seeking a copy of images recorded by the CCTV system (within the statutory time frame of forty days)?
- Has the policy on the use of CCTV and right of access been communicated to staff, pupils and visitors?
- How are new students/staff informed of policy on the use of CCTV and right of access?

**The School believes the above Policy addresses all the questions raised.**

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