

WHITEHOUSE PRIMARY SCHOOL

CCTV Policy



Aspirational Opportunities for All

Date:	January 2020
Review Date:	January 2021
Reviewer:	Data Protection Officer

Purpose

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

CCTV systems are installed externally on the premises for the purposes 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. Night time recording is motion only. CCTV surveillance at the school is intended for the purposes of;

- Protecting the school buildings and assets, both during and after school hours
- Promoting the health and safety of staff, pupils and visitors
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Supporting the police in a bid to detect and deter crime
- Assisting in identifying, apprehending and prosecuting offenders
- Ensuring that the school rules are respected so that the school can be properly managed

The system does not have sound recording capability.

The CCTV system is operated by Petch Protection Solutions, and the deployment is determined by the schools leadership team.

The school's CCTV is registered with the Information Commissioner Office under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

Access to images recorded by the CCTV system is strictly limited in school. All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and of the restrictions in relation to access to and disclosure of recorded images.

1. 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 Commissioners Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

The Code of Practice is published at <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently placed to be visible at the main external entrances to the school. Signs will contain details of the purpose for using CCTV (see Appendix A). 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 endeavoured 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.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation eg 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 Regulations and Data Protection Act 2018.

2. Location of Cameras

The cameras are sited so that they only capture images relevant to the purpose 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 school premises, which will include outdoor areas. CCTV will not be used in classrooms

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

- Protection of school buildings and property – the building's perimeter, entrance and exits, lobbies and corridors, special storage areas and areas for receiving goods/services
- Monitoring of Access Control Systems – monitor and record restricted access areas at entrance 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 gate, traffic control
- Criminal Investigations (carried out by the police) – robbery, burglary, theft surveillance

3. Covert Monitoring

The school will not engage in covert surveillance

4. 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. The school will store data securely at all times.

5. 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 systems 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.

6. Subject Access Requests

- Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR
- All requests should be made in writing to the Data Protection Officer who can be contacted by email to info@mobile-sbm.com Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified eg time, date, location.
- The school does not have a facility to provide copies of CCTV footage but instead the individual may be allowed to view the CCTV footage if available
- The school reserves the right to refuse access to CCTV footage where this could prejudice the legal rights of other individuals, jeopardise an ongoing investigation or have safeguarding implications.

7. Access and Disclosure of Images to Third Parties

- There will be no disclosure of recorded data to third parties other than authorised personnel such as the police and the service providers to the school where these would reasonably require access to the data (eg investigators)
- Requests for images should be made in writing to the Data Protection Officer
- The data may be used within the schools discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

8. 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 in 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 (eg an access log) to or the release of tapes or any material recorded or stored on 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 principal 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 both bona fide use as appropriate by the Headteacher
- Ensure that when a zoom facility on 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 on individuals reasonable expectation of privacy in public areas

10. CCTV Signage

It is a requirement of the Data Protection Act 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 also include the following;

- That the area is covered by CCTV surveillance and pictures are recorded
- The purposes of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

Example sign



Warning

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of the school and its property.

The system will be in operation 24 hours a day, every day.

These images may be passed to the police.

The scheme is controlled by the school.

For more information contact phone number

11. Privacy Impact Assessments and Privacy by Design

CCTV has the potential to be privacy intrusive. The school will perform a privacy 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

12. Policy Review

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or information commissioner's advice may trigger interim reviews