



CCTV Policy

Date: 10/21

Review date: 10/22

Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) cameras (including bodycams) at our school.

- The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- Oakhurst Community Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss of, or damage to, school property.
- The system comprises a number of fixed and dome cameras located around the school site. The CCTV is monitored centrally from the school office by the School Business Manager and the Data Controlling Officer, Lizzie Christopher. The system does not have sound recording capability.
- This Code follows Data Protection Act guidelines.
- The Code of Practice will be subject to review to include consultation as appropriate with interested parties.

Objectives of the CCTV scheme

The system has been installed by the school with the primary purpose of reducing the threat of crime generally, protecting our premises and helping to ensure the safety of all of our staff, students and visitors consistent with respect for the individuals' privacy.

- To increase personal safety of staff students and visitors and reduce the fear of crime
- To deter those with criminal intent and protect the school buildings and their assets
- To assist in the prevention and detection of crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff or students and assist in providing evidence to managers and/or to a member of staff or student against whom disciplinary or other action is, or is threatened to be taken.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking.

Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

Statement of Intent

- 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/media/1542/cctv-code-of-practice.pdf>
- CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B).
- The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- Cameras will be used to monitor activities within the school and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Tapes will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Tapes will never be released to the media for purposes of entertainment.
- 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

- 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.
- The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- CCTV will not be used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored.
- Members of staff should have access to details of where CCTV cameras are situated.
- Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

4. Monitoring procedures

- Camera surveillance may be maintained at all times. A monitor is installed in the main school office to which pictures will be continuously recorded.
- The school may in exceptional circumstances set up covert monitoring. For example:
 - i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
 - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained from a member of the senior leadership team.

Covert monitoring must 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 toilet cubicles.

5. Controls and Hardware

- Access to the CCTV controls and hardware devices will be strictly limited to the SLT
- Visitors and other contractors wishing to access the CCTV controls and hardware devices will be subject to particular arrangement as outlined below.
- SLT must satisfy themselves over the identity of any visitors and other contractors wishing to access the CCTV controls and hardware devices and the purpose of the visit. Where any doubt exists access will be refused.
- The Scheme will be administered and managed by the Headteacher or her/his nominee, in accordance with the principles and objectives expressed in the code.
- The day-to-day management will be the responsibility of the Senior Leadership Team (SLT)

6. Storage and Retention of CCTV images

- Recorded data will be retained in line with the recording equipment manufacturer's recommendations and 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.
- Recordings may be viewed by the Police for the prevention and detection of crime
- Viewing of discs by the Police must be recorded in writing.
- Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.
- A record will be maintained of the release of recordings to the Police or other authorised applicants.
- All retained data will be stored securely.

7. Subject Access Requests (SAR)

- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 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.
- The school will respond to requests within 40 calendar days of receiving the written request and fee.
- A fee of £10 will be charged per request.
- 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 to and Disclosure of Images to Third Parties

- 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). Requests should be made in writing to the Headteacher.
- Applications received from outside bodies (e.g. solicitors) to view or release discs will be referred to the Headteacher. In these circumstances discs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.
- 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. Complaints

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

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

- CCTV Code of Practice (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Regulations (GDPR) legislation
- UK Police Requirements for Digital CCTV Systems - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/378449/09-05-UK-Police-Requirements22835.pdf

Appendix A

Checklist for users of limited CCTV systems, monitoring small retail and business premises.

This CCTV system and the images produced by it are controlled by Lizzie Christopher who is 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).

Swindon Borough Council and Oakhurst Community Primary School considered the need for using CCTV and decided that it is required for the prevention and detection of crime and for protecting the safety of all school users. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded	Yes	DBa	28/09/2022
There is a named individual who is responsible for the operation of the system.	Yes	DBa	28/09/2022
A system has been installed 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	DBa	28/09/2022
Cameras have been sited so that they provide clear images.	Yes	DBa	28/09/2022
Cameras have been positioned to avoid, as far as is practicable, capturing the images of persons not visiting the premises.	Yes	DBa	28/09/2022
There are visible signs showing that CCTV is in operation.	Yes	DBa	28/09/2022
Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes	DBa	28/09/2022
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes	DBa	28/09/2022
The recorded images will be retained in line with the manufacturer recommendations, and long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Yes	DBa	28/09/2022
Except for law enforcement bodies, images will not be provided to third parties.	Yes	DBa	28/09/2022
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.	Yes	DBa	28/09/2022
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	DBa	28/09/2022
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes	DBa	28/09/2022

