



**Christleton Primary School**  
**Be the best you can be**

**CCTV Policy**

|                           |                 |                    |     |
|---------------------------|-----------------|--------------------|-----|
| Document name             |                 | Author             |     |
| CCTV                      |                 | Mr Mitchell        |     |
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| September 2017            | March 2019      | March 2021         |     |
| Signed Head teacher       |                 |                    |     |
| Signed Chair of Governors |                 |                    |     |

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# Christleton Primary School

## Closed Circuit Television (CCTV) Policy

### Introduction

- Christleton 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 or damage to school property.
- The system comprises of a number of fixed cameras.
- The system does not have sound recording capability.
- The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.
- The CCTV is monitored centrally from the school office by the headteacher.
- 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.
- 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 operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

### 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:
- [http://www.ico.gov.uk/~media/documents/library/Data\\_Protection/Detailed\\_specialist\\_guides/ICO\\_CCTVFINAL\\_2301.ashx](http://www.ico.gov.uk/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.ashx)
- CCTV warning signs will be clearly and prominently placed. 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.
- 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.

### **Positioning of 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.
- Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### **Covert Monitoring**

- The school may in exceptional circumstances set up covert monitoring. For example: 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;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- In these circumstances authorisation must be obtained from the headteacher and Chair of Governors.
- 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 toilets.

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

- 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.
- All retained data will be stored securely.

### **Access to CCTV images**

- Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.
- The Governing Body give the following staff authorisation to access the recorded images; Headteacher, Deputy Headteacher, Site Maintenance Officer and School Business Manager. In the event of a serious incident requiring immediate access and in the absence of the authorised staff permission to access images must first be sought from the Headteacher or Chair of Governors.
- When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

## **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.
- A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

## **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.
- 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.
- The school will consider whether a request is genuine and whether there is any risk to the safety or the privacy intrusion to third party individuals. Consideration will be given to the nature and context of the footage requested.
- A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.
- Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

## **Freedom of Information**

- As a public authority the academy may receive requests under the FOIA or Freedom of Information (Scotland) Act 2002 (FOISA). The principal is responsible for responding to FOI requests.
- They must respond within 20 working days from receipt of the request. Section 40 of the FOIA and section 38 of the FOISA contain a two-part exemption relating to information about individuals. If you receive a request for surveillance system information, the principal will consider:
  - Is the information personal data of the requester? If so, then that information is exempt from the FOIA and FOISA. Instead this request should be treated as a data protection subject access request as explained above.
  - Is the information personal data of other people? If it is, then the information can only be disclosed if this would not breach the data protection principles.

As a public authority who has surveillance systems, the academy may also receive requests for information under FOIA relating to those surveillance systems. For example, requestors may ask for information regarding the operation of the systems, the siting of them, or the costs of using and maintaining them. If this information is held, then consideration will need to be given to whether or not it is appropriate to disclose this information under FOIA.

## **Complaints**

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

## **Staff Training**

- Staff authorised to access the CCTV system will be trained to comply with this policy.
- Staff will understand that all information relating to the CCTV images must be handled securely.
- Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.
- Staff misuse of surveillance system information will lead to disciplinary proceedings.

## **Appendix A - Checklist**

This CCTV system and the images produced by it are controlled by the headteacher who is responsible for how the system is used and The Aspire Educational Trust is responsible for for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Christleton 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 premises users. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

|   | <b>Checked (Date)</b> | <b>By</b>     | <b>Date of next review</b> |
|---|-----------------------|---------------|----------------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded.   | March 2019            | Mr O Mitchell | March 2021                 |
| There is a named individual who is responsible for the operation of the system.   | March 2019            | Mr O Mitchell | March 2021                 |
| 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.                    | March 2019            | Mr O Mitchell | March 2021                 |
| Cameras have been sited so that they provide clear images.  | March 2019            | Mr O Mitchell | March 2021                 |
| There are visible signs showing that CCTV is in operation.  | March 2019            | Mr O Mitchell | March 2021                 |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.  | March 2019            | Mr O Mitchell | March 2021                 |
| 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.   | March 2019            | Mr O Mitchell | March 2021                 |
| Except for law enforcement bodies, images will not be provided to third parties.  | March 2019            | Mr O Mitchell | March 2021                 |
| 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. | March 2019            | Mr O Mitchell | March 2021                 |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images.  | March 2019            | Mr O Mitchell | March 2021                 |