

School's Closed-Circuit Television (CCTV) System

Introduction

- 1.1 Throughout this document mention is made of video, video images or video system – this refers to images captured by CCTV hereinafter referred to as “the system”.
- 1.2 The Blue School uses closed circuit television (CCTV) images to reduce crime, to monitor the school buildings to provide a safe and secure environment for students, staff and visitors.
- 1.3 The system comprises of a number of fixed cameras located inside and outside the school buildings.
- 1.4 The system has sound recording capability.
- 1.5 The system is owned and operated by the school and the deployment of cameras is determined by the school's Leadership Team.
- 1.6 The system is not actively monitored except for specific sensitive areas including WBSC, Goods Inwards and the Milton Lane entrance. All cameras are motion sensor triggered to record video to a central system located in a secure location. Access is restricted to authorised personnel. The Controlling Officer is the designated member of the school's Leadership Team.
- 1.7 The introduction of the system was subject to consultation with staff and the school community.
- 1.8 The school's Video Schemes are registered with the Information Commissioner under Data Protection Act Regulations. The use of the video system, and the associated images and any sound recordings, is covered by Data Protection Regulations and the Protection of Freedoms Act 2012. This policy outlines the school's use of video systems and how they comply with these Acts.
- 1.9 Only specific staff authorised by the Controlling Officer can access the system and are aware of the procedures that need to be followed when accessing the recorded images (and sound, where applicable). All employees are aware of the restrictions in relation to access to, and disclosure of recorded images and sound.

2. Statement of Intent

- 2.1 The school complies with the Surveillance Commissioners Code of Practice. This can be seen at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/282774/SurveillanceCameraCodePractice.pdf
- 2.2 The school also 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
- 2.3 Warning signs are clearly and prominently placed at all external entrances to the school's campus. Additional signs provide details of the purpose for using CCTV (see Appendix B).
- 2.4 The system has been designed to provide effective coverage of key areas of the campus but the design cannot guarantee detection of every single incident.
- 2.5 All uses of CCTV will be subject to the self-assessment tools from the Surveillance Commissioners site and have their own Privacy Impact Assessments.

3. Siting the Cameras

- 3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care has been taken to ensure that reasonable privacy expectations are not violated. The school ensures that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Regulations.
- 3.2 The school makes reasonable efforts to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas. Where appropriate 'privacy masking' is used to limit visibility of non-school areas.
- 3.3 The system is not used in classrooms with the exception of the Isolation Unit and to protect equipment in the Music classroom, KG-12.
- 3.4 CCTV camera locations and field of view have been positioned to ensure that personal privacy and modesty is protected where appropriate. This is particularly the case where cameras are positioned to provide coverage of the washbasin and circulation space in communal toilet areas.

4. Covert Monitoring

- 4.1 In exceptional circumstances and as a last resort, the school may set up covert monitoring,
 - 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.
- 4.2 In these circumstances authorisation must be obtained from the Headteacher, the Controlling Officer.
- 4.3 Covert monitoring will be for a defined period only and will cease on completion of the investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are private, for example toilets

5. Storage and Retention of images

- 5.1 Recorded data is not 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.
- 5.2 The CCTV images will be kept for 14 days (in line with the purpose for recording this data) unless there is a current incident that is being investigated.
- 5.3 Unless notified in writing by a member of LT that for specific event, a longer retention period is required, we will retain CCTV video extract files for 28 days from the date of the recording, following which they will be deleted.
- 5.4 All retained data is stored securely and listed on the school's Data Asset Audit.
- 5.5 All retained data is stored in a searchable system. A primary copy is kept for the stated retention period and secondary copies are only created and retained during the associated investigation period.

6. Access to CCTV images

- 6.1 Access to recorded images are restricted to staff (authorised to view them by the Controlling Officer) and will not be made more widely available.

7. Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to video footage relating to themselves under the Data Protection Regulations.
- 7.2 All requests should be made in writing to the school's Data Protection Lead or Data Protection Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. This will include date, time and location and in the understanding that images may no longer be available bearing in mind retention periods.
- 7.3 The school will immediately indicate receipt and then respond within 30 calendar days of receiving the written request.
- 7.4 The school reserves the right to refuse access to images.
- 7.5 All reasonable attempts will be made to allow the viewing of video images, but if others can be identified and their consent is not provided, then selected images only may be provided. If still images continue to identify others then a transcript describing the scene will be provided and the reasons for not releasing the images will be recorded. This transcript might not meet the needs of the subject in requesting access.
- 7.6 The school will not provide copies of images to others unless instructed to do so in compliance with the Law.

8. Access to and Disclosure of Images to Third Parties

- 8.1 There will be no disclosure of recorded data to third parties' other than to authorised personnel of UK Police and other UK enforcement agencies, and service providers to the school where these would reasonably need access to the data and only with the correct authorisation.
- 8.2 Access requests should be made in writing to the school's Data Protection Lead or Data Protection Officer.
- 8.3 The data may be used and shared with authorised third parties, eg: employee's professional association representative and HR/Legal advisors to the school, within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9. Complaints

- 9.1 Complaints and enquiries about the operation of the system should be directed to the school's Data Protection Lead or Data Protection Officer in the first instance.