



HALL GREEN SCHOOL

CCTV POLICY

Adopted:	10 February 2021
Last Review:	January 2020
Next Review:	10 February 2023
Governing Committee:	Full Governing Body
Responsibility:	Miss K Slater - Headteacher Mrs M Shellis - Chair of Governors

Statement of intent

At Hall Green School, we take our responsibility towards the safety of staff and pupils very seriously. To that end, we use Closed Circuit Television (CCTV) cameras to monitor both the members of our school and premises in a very specific way.

The law states that we can use a CCTV system to monitor our premises, providing our system complies with the Data Protection Act 2018.

The purpose of this policy is to manage and regulate the use of the CCTV system at the school and ensure that:

- We comply with GDPR regulations and the Data Protection Act 2018.
- The images captured are usable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.

This policy covers the use of CCTV and other systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing.
- Taking action to prevent a crime or wrongdoing.
- Using images of individuals that could affect their privacy.

1. Legal framework

1.1 This policy has due regard to relevant legislation, including, but not limited to the following:

- The Children Act 1989
- The Equality Act 2010
- The Freedom of Information Act 2000
- Keeping Children Safe in Education 2016
- GDPR Regulations 2018
- The Data Protection Act 2018

1.2 This policy will be implemented in conjunction with the school's:

- Data Protection Policy
- E-safety Policy
- Freedom of Information Policy

2. Objectives

2.1. The CCTV system will be used to:

- Maintain a safe environment
- Ensure the welfare of pupils and staff and uphold school policies
- Deter criminal acts against persons and property
- Assist the police in identifying persons who have committed an offence

3. Protocols

3.1. The CCTV system is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 2018.

3.2. The system complies with all additional legislation including:

- The Commissioner's Code of Practice for CCTV 2008
- The Surveillance Camera Code of Practice 2013, published by the Home Office.

3.3. The CCTV system is a closed digital system which does not record audio.

3.4. Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the Code of Practice of the Information Commissioner.

3.5. The CCTV system has been designed for maximum effectiveness and efficiency. However, the school cannot guarantee that every incident will be detected or covered; 'blind spots' may exist.

3.6. The CCTV system will not be trained on individuals unless an immediate response to an incident is required.

3.7. Additionally, the CCTV system will not be intentionally trained on private vehicles or property outside the perimeter of the school.

3.8. The system will:

- Only be used for the purpose specified, which is in pursuit of a legitimate aim.
- Be designed to take into account its effect on individuals and their privacy and personal data.
- Be transparent and include a contact point through which people can access information and submit complaints.
- Have clear responsibility and accountability procedures for images and information collected, held and used.
- Have defined policies and procedures in place which are communicated throughout the school.
- Only keep images and information for as long as required.
- Restrict access to retained images and information with clear rules on who can gain access.
- Consider all operational, technical and competency standards, relevant to a system and its purpose, and work to meet and maintain those standards in accordance with the law.
- Be subject to stringent security measures to safeguard against unauthorised access.
- Be regularly reviewed and audited to ensure that policies and standards are maintained.
- Only be used for the purposes for which it is intended, including supporting public safety, protection of pupils and staff, and law enforcement.
- Be accurate and well maintained to ensure information is up-to-date.

4. Security

4.1. Access to the CCTV system, software and data will be strictly limited to authorised operators, permitted viewers and will be password protected.

4.2. Authorised CCTV system operators are:

- Building Services Supervisor
- Assistant Building Services Supervisor
- Heads of House
- Network Manager
- Assistant Network Manager
- Headteacher
- Deputy Headteachers
- Assistant Headteachers
- SENCO

4.3. In circumstances where other individuals (permitted viewers) are required to view images and CCTV footage, the Headteacher is able to grant authorisation to those permitted viewers within school.

4.4. The main control facility is kept secure and locked when not in use.

- 4.5. If covert surveillance is planned, or has taken place, copies of the authorisation forms will be completed and retained.
- 4.6. Camera systems will be properly maintained at all times.
- 4.7. Visual display monitors are only located within the offices or rooms of authorised CCTV operators.

5. Privacy

- 5.1. Live and recorded materials will only be viewed for the purpose of investigating incidents.
- 5.2. Viewings of images by the police will be recorded in the log.
- 5.3. Images will only be retained for as long as they are required. The system will automatically delete recordings after 14 days in accordance with the Data Protection Act 2018.

6. Code of practice

- 6.1. We have a CCTV surveillance system for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, students and visitors.
- 6.2. The system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel only.
- 6.3. The school will ensure that the CCTV system is used to create a safer environment for staff, students and visitors to the school, and to ensure that its operation is consistent with the obligations outlined in the Data Protection Act 2018. The policy is available from the school's website.

7. Storage and Retention of CCTV images

- 7.1. Recorded data will be retained for 14 days. 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.
- 7.2. All retained data will be stored securely.

8. Access

- 8.1. It is important that access to, and disclosure of, the images recorded by CCTV is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

- 8.2. Requests for access will be handled in accordance with our Data Protection Policy, and with the acknowledgment that we must also prioritise the effective safeguarding of our students and staff. With that in mind, the Headteacher will only release to police authorities and legal professionals via official data request methods. Recorded images cannot be released to members of the public without a Subject Access Request (see 8.4).
- 8.3. Releasing the recorded images to third parties will only be permitted by the Headteacher in the following limited and prescribed circumstances, and to the extent required or permitted by law:
- The police – where the images recorded would assist in a specific criminal inquiry.
 - Prosecution agencies – such as the Crown Prosecution Service (CPS).
 - Relevant legal representatives – such as lawyers and barristers.
 - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of the Data Protection Act 2018 and the Freedom of Information Act 2000.
- 8.4. Subject Access Requests
- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
 - Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified e.g. date, time and location.
 - The school will respond to requests within one month of receiving the request.
 - As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and still, pixelated images will be provided. Refusal to disclose images, even if pixelated, may be appropriate where its release is:
 - Likely to cause substantial and unwarranted damage to an individual
 - Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.
- 8.5 Requests for access or disclosure will be recorded and the Headteacher will make the final decision as to whether recorded images may be released to persons other than the police.
- 8.6 All disks containing images belong to and remain the property of the school.
- 8.7 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

- 9.1. Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher at the school.
- 9.2. If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioner's Office, they are advised to contact the Information Commissioner's Office via www.ico.org.uk.

10. Monitoring and review

- 10.1. The Headteacher will be responsible for reviewing this policy every two years.