



Excellence for All

CCTV POLICY

Rationale

The main duty placed on the school is the need to provide a safe and secure environment for its students, staff and visitors and to have in place effective procedures to enable the school to achieve this.

The school takes its responsibility towards the safety of students, staff and visitors very seriously. We use surveillance cameras to monitor any instances of physical damage to our school or persons.

Aims

- To manage and regulate the use of the CCTV systems and ensure that we comply with the UK GDPR
- The images that are captured are suitable for the purpose we require them for
- To reassure persons whose images are captured that the images are handled in accordance with data protection legislation
- To protect students, staff, volunteers, contractors, visitors and members of the public with regard to their personal safety
- To protect the school buildings and equipment
- To support the police and community in preventing and detecting crime and to assist in the identification and apprehension of offenders
- To monitor the security and integrity of the school site, deliveries and arrivals
- To record system data (recorded video footage) for a set period of time to enable retrospective reviewing of any incidents where CCTV data may assist investigations.

Camera positioning

- Locations have been selected, both internally and externally, that the school reasonably believes require monitoring
- Adequate signage has been placed in prominent positions to inform those who enter the school premises that they are entering a monitored area, identifying the school as the Data Controller and giving contact details for further information regarding the system.
- All fixed cameras are in plain sight on the school premises and the school does not routinely use CCTV for covert monitoring or monitoring of private property outside the school grounds.
- No images will be captured from classrooms, offices, WCs or hygiene rooms
- No images of public spaces will be captured except as background to cameras installed for a legitimate purpose, such as at site entrances

System Operation and maintenance

System Maintenance

- The system will be operational 24 hours a day, every day of the year
- The Head of Operations will check, or arrange for checking on a regular basis, that the system is properly recording and that cameras are functioning correctly
- The system will be formally serviced no less than annually, in accordance with the manufacturer's recommendations
- The System Manager shall be the Head of Operations assisted by the ICT Manager, who will provide oversight for technical support and network connectivity.

Viewing of System Data

- The following staff shall have the right to view system data at any time: Headteacher, Associate Headteacher and Head of Operations
- Other staff may be authorised to conduct routine viewing of system data on occasions where authorisation is provided by the Headteacher or Head of Operations
- Staff checking and servicing the system and network may, from time to time, inadvertently see recording but shall not purposefully access the system other than for the express purpose of checking and serving the system and network
- All viewing of system data will be in a suitably secure and private area to minimise the likelihood of, or opportunity for, access by unauthorised persons
- Viewing, in this context, will include both real time and retained footage

Storage of Data

- The day-to-day management of system data will be the responsibility of the System Manager or such suitable person as the System Manager shall appoint in his or her absence
- System data will be stored for no more than 30 days and automatically over-written, unless the school considers it reasonably necessary for the pursuit of the objectives outlined above to retain the system data for longer, or is lawfully required to do so by an appropriate third party such as the police or local authority. Such data shall be limited to the footage relevant to the purposes for which it is being retained
- Where such data is retained, it will be retained in accordance with legislation and the school's own UK GDPR Policy.
- Where system data is retained a log will be kept including the date, time and length of the recording, an outline of the purpose of the retention, the locations covered and where identifiable the names of groups or individuals recorded
- All retained system data will be stored in one central, secure location determined by the IT Manager and, wherever possible, meet or exceed encryption and security standards.
- Day-to-day data will be stored on hard drives within the CCTV system controllers which are locked in a hub that only the IT and Facilities' Teams have access to. Information stored on the controllers is only available to staff with the correct security credentials and password (IT Manager and Head of Operations only). The data on the system controllers is kept for approximately 30 days (governed by the amount of footage recorded on the cameras) and wiped when new footage is recorded over it.
- CCTV footage downloaded for evidence purposes will be downloaded to an external hard drive which will be securely kept by the IT Manager or Head of Operations. It will be encrypted to prevent access by unauthorized personnel.

Access to Data

- Individuals have the right to access personal data the school holds on them, including information held on the system, if it has been retained
- In line with Subject Access Requests under UK GDPR, the System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request
- A CCTV log will be maintained to record all access requests, retained footage and viewings
- Where images are disclosed a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident or other reference number if applicable
- Where images are provided to third parties, practical steps will be taken to obscure images of non-relevant individuals.

Raising awareness of this policy

We will raise awareness of this policy via:

- The staff handbook
- The school website and the School Bus Compliance Manager
- Weekly emails to parents

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010. As it is fair, it does not prioritise or disadvantage any student and it helps to promote equality at this school.

Review of policy

This procedure shall be subject to annual review.

The Governing Board approved this policy on date: 7th October 2021

Signed: Richard Pelly, Chair of Governors

Signed: Joolz Scarlett, Headteacher