

WOOD FOLD PRIMARY SCHOOL

CCTV POLICY

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Wood Fold Primary School.

A static system is in use and comprises of 5 fixed cameras. The system does not have sound recording capability.

Purpose

The purposes for which the CCTV Systems are used are:

1. To increase personal safety of pupils, staff and visitors, and reduce the risk of crime
2. To protect the school buildings and their assets
3. To support the Police in a bid to deter and detect crime
4. To assist in managing the school and ensure the safety and security of the site.

Responsible people

The people who have been appointed to oversee the system and procedures are the Headteacher and the School Business Manager.

Notification & 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>

Refer to Appendix A.

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 will include outdoor areas - CCTV will not be used in classrooms.

Visitors to Wood Fold Primary School will be aware of the use of CCTV by the use of signs which are located around the building (refer to Appendix B). In addition to this parents will be informed via letter and on the school website.

The images that are filmed will be held in a secure location and can only be accessed by those who are authorised to do so (Headteacher and School Business Manager).

The medium onto which we record images is hard disc drive and this will be replaced as follows: New recorded images overwrite the oldest stored images, typically after 15 days though the period for which images are held may be shorter or longer than this.

Maintenance

A regular maintenance programme is in place and will be carried out by the appointed contractor.

Unless required for evidential purposes, the retention period of any images recorded by our CCTV footage is typically 15 days or less and any footage that is over this period will be destroyed in the following manner: digital images will be deleted by being overwritten.

The locations that will be used for viewing of any CCTV images will be the Senior Leadership Team Admin Room and the School Business Manager's Office.

The following members of the Senior Leadership Team are authorised to access the CCTV images collected: Headteacher (Mrs Gough), School Business Manager (Mrs Armstrong).

The following members of the Senior Leadership Team staff have authorisation to view the CCTV off site: Headteacher (Mrs Gough), School Business Manager (Mrs Armstrong).

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act (refer to Appendix C).

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.

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).

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.

Should any images be required by the Police, we will follow the protocol as set out below:

- The request must be in written form, specifying the date and time (as far as possible) of the image.
- The school must provide a response to a request within 40 days.
- If the decision is taken not to release the images, then the image in question must be held and not destroyed until all legal avenues have been exhausted.

During times of school closure, the CCTV system will continue to operate as normal and will be maintained and monitored by the Headteacher and School Business Manager.

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.

This policy is published under the Freedom of Information Act and is available by contacting the Headteacher.

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

Date reviewed:	October 2020
Next Review Date:	September 2021

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 for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Wood Fold 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 its pupils, staff and visitors. 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 ICO and the next renewal date recorded	04.10.2017 07.2018 07.2019 06.2020	C Armstrong	July 2021
There is a named individual who is responsible for the operation of the system.	Yes	R Gough C Armstrong	
The problem we are trying to address has been clearly defined and installing cameras is the best solution. The decision should be reviewed on a regular basis.	Yes	R Gough	July 2021
A system has 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.	Yes		
Cameras have been sited so that they provide clear images.	Yes		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes	R Gough C Armstrong	
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.	Yes		
Except for law enforcement bodies, images will not be provided to third parties.	Yes		

The potential impact on individuals' privacy has been identified and taken into account in the use of the system.	Yes		
The organisation knows how to respond to individuals making requests for copies of their own images and if unsure, the controller knows to seek advice from the ICO as soon as such a request is made.	Yes		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes	R Gough C Armstrong	

Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

Appendix C - The Data Protection Act 1998: data protection principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –

- (a) at least one of the conditions in Schedule 2 is met, and
- (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.

2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6. Personal data shall be processed in accordance with the rights of data subjects under this Act.

7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles. For more general information, see the Guide to Data Protection.