

# **CCTV Systems Policy**

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### 1. Introduction

- 1.1 Redwood School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to safeguard and provide a safe and secure environment for pupils, staff and visitors and to prevent the loss or damage to school property. The system is used to assist in managing the school site (CCTV is not used to performance manage staff or undertake IQTL practice).
- 1.2 The system comprises of several fixed cameras both internally and externally.
- 1.3 The CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher, Business Manager, and IT Manager.
- 1.4 The CCTV system is not actively monitored ("live watched") by any member of staff; however single view camera feeds are visible in reception areas.
- 1.5 The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Headteacher, Business Manager, and IT Manager.

1.6 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 & GDPR 2018. The use of CCTV, and the associated images recordings is covered by the Data Protection Act 1998 & GDPR 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

1.7 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained 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.

#### 2. Statement of Intent

2.1 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

- 2.2 CCTV warning signs will be clearly and prominently placed at the schools.
- 2.3 The planning and design has intended to ensure that the systems will give maximum coverage but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

#### 3. Camera Locations

- 3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated. The School has ensured that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act & GDPR.
- 3.2 The school has made every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 3.3 Members of staff may request the location of cameras via request to the Head or Deputy Head.

#### 4. Covert Monitoring

4.1 The school does not use covert CCTV or audio recording.

## 5. Storage and Retention of CCTV images

- 5.1 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.
- 5.2 All retained data will be stored securely.

5.3 All recordings are set to expire between 28-31 days after recording.

## 6. Access to CCTV images (internal)

6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available (unless officially requested by the Police) as part of official investigations.

# 7. Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act & GDPR.
- 7.2 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.
- 7.3 The school will respond to requests in accordance with the GDPR (General Purpose Data Regulation) Act 2018
- 7.4 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

# 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 such as the Police where these would reasonably need access to the data.
- 8.2 Requests should be made in writing to the Head.
- 8.3 The data may be used within the school's discipline procedures as required, and will be subject to the usual confidentiality requirements of those procedures.
- 8.4 If Parents / Guardians wish to view recorded images, this would be at the discretion of the Head and no offline copies of footage will be made available.

## 9. Complaints

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

## **Further Information**

The CCTV system and the images produced by it are controlled by The IT Manager 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 & GDPR 2018).

The school has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for safeguarding and protecting the safety of staff, students and visitors.

The school will conduct regular reviews of our use of CCTV in consultation with the headteacher.

Further information on CCTV and its use is available from the following: CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)

www.ico.gov.uk

Regulation of Investigatory Powers Act (RIPA) 2000 Data Protection Act 1998 GDPR 2018