

Policy for CCTV

Introduction

William Austin Junior & Infant Schools use CCTV for the following reasons:

- To protect against crime
- To monitor the school's buildings
- To protect pupils, staff, parents, contractors and members of the public when they are on both school premises

The system comprises a number of fixed and dome cameras. All cameras located within the school grounds have night mode facility. These cameras are active 24h.

The school CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. (See Appendix 1) This means that the use of the CCTV and the associated images and any sound recordings is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act. Therefore, images of people captured on CCTV (where they can be easily identified) are defined as personal data under the Data Protection Act 1998. This policy will be reviewed as appropriate or as legal advice changes.

Responsibilities for CCTV operation

CCTV schemes will be administered and managed by the Headteachers in accordance with this policy and with guidance from the LA where necessary.

The day-to-day management of the CCTV scheme will be the responsibility of the Premises Manager, Assistant Site agent and IT technician during the day and the Premises Manager and Assistant Site agent at evenings, weekends and during school holidays.

Measures are in place to control access to CCTV equipment to prevent unauthorised access and misuse. All staff with access to the system must ensure that they adhere to the Data Protection Act 1998 and any security precautions.

The viewing of CCTV footage will be the responsibility of the Headteachers and a limited number of nominated staff. Staff or individuals connected to the schools or educational settings who wish to view CCTV footage should do so by written request (i.e. email) to the Headteachers. This email will contain information regarding the view required and the reasons why.

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 by the school's data controller in their responsibilities under the CCTV Code of Practice. All employees will be made aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

Checks and audits are carried out on a regular basis to ensure that all procedures are correctly followed, and to justify the use of CCTV.

The following staff have access to the system:

Jo Adams – Head Teacher Junior School

Bal Kang – Head Teacher Infant School

Sally Bacon – Business and Resources Manager

Darren Bowler – Premises Manager

Statement of Intent

The CCTV system is in place to monitor both school premises (including corridors and grounds) for security purposes and to ensure the safety of the staff, pupils and contractors while on the school site. The CCTV system will also be used in cases of suspected theft or where CCTV evidence is required.

The use of CCTV and the images recorded must comply with the Data Protection principles.

The schools comply 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/for-organisations/guide-to-data-protection/cctv/>

All images that are recorded comply with the Data Protection principles, and are:

- Fairly and lawfully obtained
- Adequate, relevant and not excessive
- Accurate
- Used only for purposes about which people have been informed
- Secure and protected from unauthorised access
- Not held longer than required for the purposes they were recorded
- Accessible to data subjects where a request has been made under the Data Protection Act and where the images are defined as personal data

William Austin Junior and Infant Schools will only use CCTV for the purposes stated above. CCTV or images produced from it will not be used for any other purposes, particularly those which could not reasonably be envisaged by individuals.

The Schools will ensure that pupils, staff and other people who use their buildings are informed of the use and purpose of CCTV. This will be done by means of clear and obvious notices placed around both school premises. Notices will include the following information:

- The purposes for which CCTV is being used
- Details of who to contact about the scheme
- The precise wording of a notice may vary, but suggested wordings are:
- Warning: these premises are protected by closed circuit television. The images recorded are used for the purposes of crime prevention and public safety only

Storage and Retention of recordings

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. When the retention period has been reached, all digital recordings and removable media will be destroyed or wiped securely. The Hard Disk Drives within the DVR's do this on their own by overwriting themselves once full. This is usually around 7 days. (Depending on the HDD size and image quality being stored)

All retained data will be stored securely and access will be strictly confined to authorised staff. A recording system of details will also be retained whilst the material is held.

Covert Surveillance

The schools may in exceptional circumstances set up covert monitoring. Before instigation authorisation must be obtained from the Headteachers.

For example:

- 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;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

Procedures for disclosure of CCTV recordings to other organisations

Day-to-day Access to CCTV recordings is to be restricted to staff who operate the system.

CCTV recordings will be held securely by the schools unless there is a legitimate reason to disclose them. Disclosure includes the viewing of images by someone who is not the operator of the system as well as the transfer of recordings to another organisation.

All requests for CCTV disclosure will be made in writing to the Headteachers.

Records may need to be disclosed for the following reasons:

- To the police, for the prevention and detection of crime;
- To a court for legal proceedings;
- To a solicitor for legal proceedings;
- To the media for the purposes of identification.

Where recordings have been disclosed or viewed by an authorised third party the schools will keep a record of:

- When the images were disclosed;
- Why they have been disclosed;
- Any crime incident number to which they refer;
- Who the images have been viewed by or disclosed to.

Viewing of CCTV recordings by the Police will be recorded in writing. Requests by the Police are actioned under section 29 of the Data Protection Act. The Police should provide a completed section 29 form stating that the information is required for the prevention and detection of crime. If a form is not available, or in an emergency, the schools must record in writing when and why the information has been released.

Should a recording be required as evidence, a copy may be released to the Police. Where this occurs the recording will remain the property of the schools. The date of the release and the purpose for which it is to be used will be recorded.

The Police may require the schools to retain recordings for possible use as evidence in the future. Such records will be stored and indexed so that they can be retrieved when required.

Applications received from other outside bodies (eg, solicitors) to view or release tapes will be referred to the Headteachers. In these circumstances, tapes may be released where satisfactory evidence is produced showing that they are required for legal proceedings, an information access request or in response to a Court Order.

Tapes will only be released to the media for use in the investigation of a specific crime and with the written agreement of the Police.

Subject access requests

Under section 7 of the Data Protection Act 1998, individuals who are the subject of personal data are entitled to request access to it. This includes CCTV images where they are defined as personal data within the meaning of the Act. If a request is received, a fee (up to a maximum £10) will be charged.

Where a request is been made to view an image or recording, the application must be made in writing to the Headteacher, together with details of themselves to allow us to identify them as the subject of the images and to locate the images on the system.

Both schools reserve the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

Breaches of this policy

Any breach or alleged breach of this policy or schools guidelines on the use of CCTV by school staff or other individuals will be investigated by the Headteachers.

An investigation will be carried out into any breaches of policy and procedures reviewed or put in place to ensure that the situation does not arise again.

Complaints

Any complaints about the operation of the CCTV system should be addressed to the Headteachers in writing, where they will be dealt with according to the schools complaints procedures, with reference to this policy.

References

Both schools hold a copy of the data protection guidelines for use of data with CCTV as issues by the ICO – see attached.

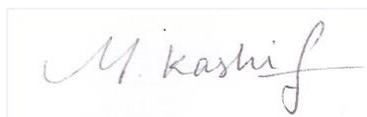
This policy will be monitored and reviewed by the ICT Technician & Premises Manager on an annual basis.

Policy updated: January 2022

Staff responsible: Darren Bowler

This policy was ratified by the Governing Body on: 26th January 2022

Signed on behalf of the Governing Body:



(signature)

M. Kashif - Chair of Governors

(printed)

Certificate

Organisation Name:

WILLIAM AUSTIN JUNIOR SCHOOL

Reference number:

Z874656X

Tier:

Tier 2

Start date:

10 September 2004

End date:

9 September 2022

This data controller states that it is a public authority under the Freedom of Information Act 2000 or a Scottish public authority under the Freedom of Information (Scotland) Act 2002