



Long Lane Primary School

CCTV Policy

Date	Description
January 2021	Operations Committee

Review Schedule	Two Years
Next Review	January 2023

Aims

The aim of this policy is to provide a set of guidelines to enable staff, parents and pupils to understand:

- The law regarding use of CCTV systems within schools
- How recorded images should be processed, stored, archived and deleted/destroyed
- How staff, the police, parents and pupils can access recorded images

The objective of the policy is to ensure that the school acts within the requirements of the Data Protection Act 1998 when retaining and storing CCTV images, and when making such images available to individuals, and that the process of responding to enquiries for such data is also legal.

Responsibility

The Headteacher is responsible for:

- Maintaining day to day management of the system and images collected by CCTV at the school;
- Ensuring the provision and maintenance of all equipment forming part of the Long Lane Primary School CCTV System;
- Maintain close links with Thames Valley Police.

The Governors are responsible for:

- Accepting overall responsibility for the system and for ensuring that this policy is complied with;
- Ensuring the interests of Long Lane Primary School and other organisations are upheld in accordance with the terms of this policy;
- reviewing and agreeing to any proposed alterations and additions to the system or this policy, in partnership with the Headteacher.

Policy Statement

A CCTV system is installed externally for the purpose of enhancing security of the building and its associated equipment both during daylight and night hours each day. The Long Lane Primary School system consists of up to 19 CCTV cameras which are linked to the Headteacher's office where live images from static cameras are monitored. The images being viewed enable the monitoring staff to act after an incident occurs by viewing recorded images. The CCTV cameras are not intended to be used as 'live monitoring'. CCTV surveillance at the school is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- assisting the Police in identifying, apprehending and prosecuting offenders;
- preventing bullying and allowing staff and parents to view actions of individuals when there are discrepancies between verbal accounts.

Guidance and Procedures

Use of CCTV systems:

The CCTV system within Long Lane Primary School is maintained as a security system to assist in the prevention or detection of theft, vandalism or violence.

Data Protection – the law:

The Data Protection Act 2018 (implementing the General Data Protection Regulation (GDPR)), and other key pieces of legislation, has had a positive effect on reducing the potential for the misuse of public and private CCTV systems. The enactment of The Human Rights Act 2000, Data Protection Act 1998, Regulation of Investigatory Powers Act 2000, and associated Codes of Practice particularly have meant that systems must not only be used in accordance with current legislation; fairly and lawfully, but with the utmost probity at all times. They must also be used in a manner that stands up to scrutiny and is accountable to the people they are aiming to protect. Images from CCTV systems can be categorised as personal data if the individual is clearly identified by the image.

Commented [GU1]: Amended to reflect updated Data Protection Act (2018 v 1998) EJB

Data Protection Registration:

The Data Protection Registration for Long Lane Primary School is No. Z5218895 and includes registration of the CCTV system.

Management of recorded material:

Long Lane Primary School ensures that images from the CCTV system are kept securely and access to them is only by those authorised to see them – confidentiality is respected. The law also provides that such images should not be kept longer than is required, and the length of time for keeping such images depends on the likely use of the images; for example, if it is considered that there may be a need for police to see images as evidence.

The named person with overall responsibility for managing images collected by CCTV within the school is Mr Peter Thorne.

- The CCTV server is located within a locked room to which access is restricted.
- CCTV images held on the hard drive of the DVR will be overwritten on a recycling basis once the drive is full and, in any event, will not be held for more than 28 days **except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.**
- Recording media no longer in use will be securely destroyed.

Ownership and management of the CCTV system:

Ownership of the CCTV system used in Long Lane Primary School rests with the school.

Signage:

Appropriate signage is situated at the main entrance to the school site and numerous locations across the school, informing the public of the presence of CCTV monitoring.

Accessing personal data: guidance

Requests for personal information or data must be made to the school in writing and accompanied by the payment of a £10 fee (unless the applicant believes they may be exempt by virtue of their personal circumstances). Since data on a CCTV system is unstructured, the applicant must provide sufficient information to identify where the relevant images are likely to be obtained (date and approximate time).

Any request from an individual for disclosure of personal data, which they believe is recorded by virtue of the system will be received by the data controller and directed to the system manager in the first instance.

Access to personal data can be refused on several counts, including:

- The requested access fee remains unpaid three months after a written request for payment is made;
- Insufficient information has been supplied to enable the system manager to identify the data requested (this in spite of a request for clarification);
- Insufficient information or proof of identity has been provided by the applicant (this in spite of a request for further details);
- An exemption to the subject access right (such as the use of the image for the prevention or detection of crime, or for the apprehension and prosecution of offenders) applies;
- Providing access to the data would identify a third party whose consent has not been given, and the system manager considers that it is not reasonable to comply with the request without this permission.

Third party access to recorded images is restricted to those school staff and others who need to have access in order to achieve the purpose(s) of using the equipment. This will include police if such access is required for the prevention or detection of crime. All access to the medium on which the images are recorded will be documented, and disclosure of the recorded images to third parties will only be made in limited and prescribed circumstances. All school staff must be able to recognise a request for access to recorded images by data subjects and every request for the release of personal data generated by the system will be sent to the Headteacher for action.