

*Greenleys Junior School*



LEARNING *for* LIFE

# CCTV Policy

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| <b>Date of Approval:</b>             | <b>01 October 2020</b> |
| <b>Date of Next Review:</b>          | <b>October 2023</b>    |
|                                      |                        |
| <b>Signed: Executive Headteacher</b> | <b>M Talbot</b>        |
| <b>Signed: Chair of Governors</b>    | <b>M Hall</b>          |

## Document History

| Date           | Change Reference | Summary of Change                                   |
|----------------|------------------|---|
| 30 August 2020 | Page 3           | One camera in reception now records sound           |
| 30 August 2020 | Page 3           | Name of the school's DPO removed                    |
| 30 August 2020 | Page 5           | Access no longer via a password                     |
| 30 August 2020 | Page 5/6         | Images now transferred to memory sticks and not CDs |
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## **CCTV Policy for Greenleys Junior School**

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Greenleys Junior School. The CCTV system is owned by the school. It records fourteen key areas of the school that could be vulnerable to vandalism or theft. It does not overlook any public spaces that are not within the school grounds. The system records for 26 days and then the data is lost as it re-records for another 26 days overwriting the old data. A privacy impact assessment has been undertaken and in light of this, the cameras only record for 26 days and the recording is not kept. Sound is recorded on one device in reception.

*Regulation of Investigative Powers Act (2000) which requires owners of CCTV Surveillance equipment to hold a written policy governing the use of such equipment and the retention and usage of images captured whilst in use.*

### **Introduction**

1.1 Greenleys Junior School uses closed circuit television (CCTV) images to reduce crime and monitor school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property. According to Article 6e of General Data Protection Regulation (2018) the processing of CCTV footage is necessary for the performance of a task carried out in the public interest.

1.2 The system comprises a number of fixed cameras. The system has sound recording capability and the camera positioned in reception captures sound as well as images.

1.3 The CCTV is owned and operated by the school, the deployment of which is determined by the school's leadership team.

1.4 The CCTV is monitored centrally from the school offices by the Site Manager and members of staff trained to operate it.

1.5 Greenleys Junior School's appointed Data Protection Officer is Cambridgeshire's ICT Service.

1.6 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice (Information Commissioner's Office). All employees are aware of the restrictions in relation to, access to and disclosure of recorded images.

### **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.

2.2. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

## **Siting the cameras**

3.1 CCTV will not be used in classrooms but in areas within / outside the school that have been identified by staff and pupils as not being easily monitored.

3.2 Cameras will be 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 will ensure that the location of equipment is carefully considered.

3.3 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

3.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras for the purpose of covert monitoring.

3.5 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained for Covert Monitoring to take place, as set out in the Regulation of Investigatory Power Act 2000.

3.6 All installations must comply with the following standards and guidelines:

ACPO Security Systems Policy

BS 8418 Installation and remote monitoring of detector activated CCTV Systems – Code of Practice

BS EN 50132-7: CCTV Application Guidelines

3.7 There is clear signage around the school displaying that there are CCTV cameras. There is also a clear sign in the school foyer area.

## **Covert Monitoring**

4.1 The school may, in exceptional circumstances, set up covert monitoring. For example:

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

4.2 In these circumstances authorisation must be obtained from the Headteacher / Chair of Governors.

4.3 Covert monitoring must cease following completion of an investigation.

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

## **Storage and Retention of CCTV Images**

5.1 Recorded data will not be retained for longer than is necessary. Unless required for evidential purposes, the retention period of any images recorded by the CCTV footage is approximately 26 days and any data that is over this period will be destroyed by overwriting of the digital images. If required for evidential purposes, the data will be destroyed as soon as it is no longer required.

5.2 The CCTV system is owned by the school. The CCTV system will be operated 24 hours each day, every day of the year. During times of school closure, the CCTV system will continue to operate as

normal and will be maintained and monitored by the usual maintenance company of the system or by the Site Manager.

### **Access to CCTV Images and monitoring of the hardware**

6.1 The images that are recorded are stored directly onto the recording device and can only be accessed by those who are authorised to do so. The site manager and trained members of staff are authorised to access the stored images. Access to recorded images are restricted to these individuals and will not be made more widely available.

6.2 All cameras are monitored from the school office.

The site manager checks the cameras every week and checks the CCTV screen in the school office to ensure that the time and date are correct.

### **Subject Access Requests (SAR)**

7.1 Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images.

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 within 5 days of receiving the written request. The school may not charge a fee for this service unless it is deemed to be manifestly unfounded or excessive.

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.

7.5 If the school receives a request under the Freedom of Information Act it will comply with requests within 5 working days of receiving the request due to the 7 days that the recording device holds the information for.

### **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.

8.2 Images will only be released to 3rd Parties if authorised by one of those named above. Images will only be released if they are required for the performance of a task in the public interest or necessary for the compliance with a legal obligation.

8.3 CCTV footage may be viewed by the Police for the prevention and detection of crime. If an unsolicited request is made by the police for any images, we will follow this protocol:  
The request must be in written form, specifying the date and time (as far as possible) of the image.  
The rank of the requesting officer must be Sergeant or above.  
The school must provide a response to a request within 5 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.

8.4 Should footage be required as evidence, a copy may be released to the Police (on a memory stick

clearly labelled and sealed in plastic box or envelope. Footage will only be released to the Police on the clear understanding that the memory stick remains the property of the school, and both the memory stick and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the memory stick or any part of the information contained thereon. On occasions when a Court requires the release of original footage this will be produced from the secure evidence store, complete in its sealed bag. The Police may require the school to retain the information held on the memory stick for possible use as evidence in the future. Such memory sticks will be properly indexed and properly and securely stored until they are needed by the Police.

8.5 Applications received from outside bodies (e.g. solicitors) to view or release footage will be referred to the Headteacher. In these circumstances recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in some circumstances.

## **Complaints**

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

## **Further information**

Further information on CCTV and its use is available from the following:

CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioner's Office)

[www.ico.gov.uk](http://www.ico.gov.uk)

Regulation of Investigatory Powers Act (RIPA) 2000

Data Protection Act 1998

European General Data Protection Regulations (2018)