

CCTV Policy

1. Purpose of the policy

The purpose of this policy is ensure the operation of the CCTV system at Chailey School is compliant with the requirements of the General Data Protection Regulation 2018.

CCTV is installed internally and externally on the premises to enhance the security of the school and support the safety of staff, pupils, parents and other visitors. CCTV surveillance at the School is intended for the purposes of:

- Protecting the school buildings and school assets
- Promoting the health and safety of staff, pupils and visitors
- Monitoring student behaviour
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Supporting the police in identifying, apprehending and prosecuting offenders

The CCTV system is operated by Chailey school and used in a way decided by Chailey's senior leadership team.

All authorised employees are aware of the procedures and responsibilities that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of recording images.

2. Scope of the policy

This policy relates to the location and use of CCTV and the monitoring, recording and use of recorded material. The school complies with the information commissioner's office CCTV Code of Practice to ensure it is used.

CCTV awareness signs will be clearly and prominently placed at the main external entrance to the school. Signage contains details of the purpose for using CCTV (**see Appendix A**). The school will ensure that signs are placed within the controlled areas.

CCTV monitoring will be conducted in a manner consistent with all existing school policies, including Equality & Diversity Policy, Codes of Practice.

Video monitoring of public areas is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending the school.

Recognisable images captured by CCTV systems are personal data and are subject to the UK General Data Protection Regulation and Data Protection Act 2018.

3. Camera locations

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed. Care will be taken to ensure that reasonable privacy expectations are not violated. The location of equipment is carefully considered to ensure that the recorded images comply with the legislation.

The school will position the cameras so that their coverage is restricted to the school premises.

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

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

CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of school buildings and property:** The buildings perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services.
- **Monitoring of Access Control System:** Monitor and record restricted access areas at entrances to buildings and other areas.
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms.
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates.
- **Criminal Investigations (carried out by the police):** Robbery, burglary and theft surveillance.

4. Covert monitoring

The school retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or serious 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.

In these circumstances, authorisation must be obtained beforehand from the Head Teacher and Chair of Governors.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets. Covert monitoring will cease following completion of an investigation.

5. Retention of images

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation or prosecution of that issue.

Where data is retained for longer than 31 days an electronic file held on a secure central server will be kept for as long it is needed to achieve this purpose.

6. Access to recordings

Access to recordings will be restricted to the staff authorised to view them. The Head Teacher has responsibility for the management of the CCTV system and may delegate the administration of the system to an appropriate member of staff. Only authorised staff may access recordings.

7. Rights of individuals

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the UK GDPR. These rights are described in the School Data Protection Policy and Privacy Notices.

All requests should be made in writing via the school office. Subject to approval, the applicant may view the CCTV footage, but copies are not available.

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.

The school will respond to requests within 30 days of receiving the request.

8. Access to 3rd parties

Images will only be shared with third parties such as the police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

If an order is granted by a court for disclosure of CCTV images, then this should be complied with following consultation with the school's Data Protection Officer.

Requests for images should be made in writing via the School Data Manager.

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.

9. Responsibilities

The Head Teacher will:

- Ensure CCTV systems are implemented in accordance with this policy
- Oversee CCTV monitoring for safety and security purposes within the school
- Ensure existing CCTV systems will be evaluated for compliance with this policy
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access to, or the release of, recordings
- Ensure that the CCTV view from fixed location cameras confirms to this policy
- Ensure all areas being monitored meet the reasonable expectations of individuals
- Ensure cameras are non-intrusive in terms of their positions and views of neighbouring residential accommodation
- Ensure recordings are physically secured and restricted to authorised staff
- Ensure that images recorded on tapes/DVS/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or other reasonable investigation

10. Data Protection Impact Assessment

The school will perform a Data Protection impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

11. LINKS WITH OTHER POLICIES

This CCTV policy is linked to the school:

- Data Protection Policy
- Freedom of Information Policy
- Acceptable use policy
- Safeguarding policy
- Privacy notices

APPENDIX A CCTV SIGNAGE

It is a requirement of the Data Protection Act 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 purposes of using CCTV.
- The name of the school or CCTV company
- The contact telephone number or address for enquiries

Example Sign



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purposes of crime-prevention, the prevention of anti-social behaviour, for the safety of our staff and students and for the protection of the school and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police.

This scheme is controlled by the school
For more information contact XXXX - XXXXXXX