

CLOSED CIRCUIT TELEVISION (CCTV) POLICY

Version 1.0

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Next Full Review Due: Summer 2022

Reviewer: Premises Manager

Governor Link: Chair of Resources

CCTV POLICY

East Barnet School, Chestnut Grove, East Barnet, EN4 8PU

1 Principles

- 1.1 The purpose of this Policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) owned and operated by East Barnet School. CCTV is in use to:
- a) increase personal safety of students, staff and visitors, and reduce the fear of crime
 - b) monitor and minimise unauthorised and inappropriate vehicle access
 - c) assist in managing the school
 - d) protect the school buildings and their assets
 - e) assist in identifying, apprehending and prosecuting offenders
 - f) protect members of the public and private property

2 General

2.1 The CCTV system:

- a) comprises many fixed cameras.
- b) does not have sound recording enabled.
- c) is part of the electronic infrastructure of the building and is operated solely by the school and the deployment of which is determined by the school's senior leadership team (SLT).
- d) is accessible only by certain key staff with responsibility for security or behaviour.

2.2 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of 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.

2.3 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 Premises Manager 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.

2.4 The Premises Manager has responsibility for the control of images and deciding how the CCTV system is used. The school has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used.

2.5 Any changes to CCTV monitoring will be subject to consultation with staff and the school community.

3 Statement of Intent

3.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice¹ to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The school also complies with the ICO's [processes for Subject Access Requests²

3.2 CCTV warning signs are prominently placed in external places close to school entrances.

3.3 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

4 GDPR Compliance

4.1 The school will process all personal data captured on the CCTV system securely and only allow access for the purposes stated in this policy.

4.2 This policy and any subsequent procedures will ensure the confidentiality, integrity and availability of the system and how any personal data is processed.

5 Siting the Cameras

5.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed, and care is taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

5.2 The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

5.3 CCTV is not used in classrooms.

5.4 Members of staff have access to details of where CCTV cameras are situated.

6 Storage and Retention of CCTV images

6.1 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.

6.2 All retained data will be stored securely.

6.3 Access to any stored data will only be granted to authorised people.

7 Access to CCTV images

7.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

¹ <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

² <https://ico.org.uk/media/for-organisations/documents/2014223/subject-access-code-of-practice.pdf>

7.2 All requests to access data will be recorded stating:

- a) Date & time
- b) Person requesting access
- c) Reason
- d) Outcome
- e) If a copy of the recording is taken

7.3 The entry will be signed by the person requesting

7.4 Any requests to view data which do not meet the criteria set out in this policy will be reported to the DPO.

8 Subject Access Requests (SAR)

8.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

8.2 All requests should be made in writing to the data controller. 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.

8.3 The school will respond to requests without delay and at the latest within one month of receipt.

8.4 As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and, if it is not possible to conceal the identity of others, disclosure is unlikely. Refusal to disclose images may also be appropriate where its release is:

- a) Likely to cause substantial and unwarranted damage to an individual.
- b) Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

9 Access to and Disclosure of Images to Third Parties

9.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police or other authorised agencies.

9.2 Requests for access should be made in writing to the Data Protection Officer (DPO).

9.3 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.

10 Complaints

10.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Premises Manager.

- 10.2 If the issue remains unresolved, complainants should contact the Headteacher in writing.
- 10.3 If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioners Office, they are advised to contact the Information Commissioners Office via www.ico.org.uk.

11 Further Information

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

- a) CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- b) www.ico.org.uk
- c) Regulation of Investigatory Powers Act (RIPA) 2000
- d) Data Protection Act 1998

CCTV Signage

It is a requirement of the Data Protection Act 1998 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:

- a) That the area is covered by CCTV surveillance and pictures are recorded
- b) The purpose of using CCTV
- c) The name of the school
- d) The contact teleumber or address for enquiries