Leigh Primary School

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'Caring, Sharing and Learning Together'

CCTV Policy

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1. Purpose

The purpose of this policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) at Leigh Primary School, hereafter referred to as 'the school'. \
This policy adheres to guidelines from the Information Commissioner's Office(ICO) CCTV
The system is operated and monitored by the School Office Staff.

2. Aims

CCTV systems are installed externally on premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the School is intended for the purposes of:

- To increase personal safety for pupils, staff, parents and visitors when entering and leaving the school.
- To protect the school buildings and assets.
- To reduce the fear of crime.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders.
- Supporting disciplinary and grievance procedures subject to confidentiality

2. Scope

The system comprises of 2 cameras. The cameras are in operation continuously 24/7. The system does not have sound recording capability.
The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.
The school's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
All authorised operators and employees with access to images are aware of the procedures that need to be follow when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.
This policy relates directly to the location and use of the CCTV and the monitoring, recording and subsequent use of such recorded material. The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice, Data Protection Act 2018 and the General Data Protection Regulations (GDPR) to ensure it is used responsibly and safeguards both trust and confidence in its use.
The Code of Practice is published at: https://ico.org.uk/media/1542/cctv-code-of-practice.pdf
CCTV warning signs will be clearly and prominently placed at the main external entrance to the school. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.
CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including the provisions set down in equality and other educational and related legislation.
This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.
Video monitoring of public areas for security purposes within school premises 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.
All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulations and Data Protection Act 2018.

3. Locations of cameras

The cameras are sited externally and so that they only capture images relevant to the purposes for which they have been installed (as described above), 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 to ensure that the images captured comply with the legislation.
The school will make every effort to position the cameras so that their coverage is restricted to the school premises, which includes both indoor and outdoor areas does it cover internal areas. Any areas considered private, or which do not belong to the school will be blocked from view and not recorded; however, areas of public space in close proximity to the school will be captured such as the road and edges of the The Green which is public space.
CCTV will not be used in classrooms but in limited areas outside the school that have been identified by staff and pupils as not being easily monitored.
Members of staff will have access to details of where CCTV cameras are situated. CCTV video monitoring and recording of public areas may include the following:

1. Side path entrance to lower school playground
2. Front path inside school premises
3. Outside the school office covering the main gate and entrance to upper school playground
4. Road outside the school
5. The eastern edge of Leigh Green

4. Covert monitoring

The school does not engage in covert surveillance.

5. Storage and retention of CCTV images

Storage of CCTV images is via CCTV hard drive located in the school office. Recorded data will not be retained for longer than 60 days except where the image identifies an issue and is retained for a specific purpose in the context of an investigation/prosecution of that issue. The system automatically destroys images after 60 days. The school will store data securely at all times.
Office staff retain the right to observe live footage of cameras and obscured areas on cameras are not recorded.

6. Access to CCTV images

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Head Teacher, Mrs J Halfhide and Data Protection Lead Jane Burbridge who may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7. Subject Access Requests (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.
All requests should be made to Mrs J Halfhide, Head Teacher. Individuals submitting a request for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location. Identification may be requested from individuals where appropriate.
The school does not have a facility to provide copies of CCTV footage to individuals. Instead the applicant may view the CCTV footage if available and appropriate.
The school will respond to requests within 1 calendar month of receiving the request together with proof of identity, but if a request is received outside of the school term 1 month will begin from when school term begins again.
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.

8. Access and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police, in response to a court order and service providers to the school where these would reasonably need access to the data (e.g. investigators).
Requests for images from the above should be made in writing to Mrs J Halfhide, Head Teacher, Leigh Primary School: Tel No: 01732 832660 Email: office@leigh.kent.sch.uk
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.
Viewing or release of any CCTV images or recording to authorised third parties will be entered into an access log. The log will record a unique reference number, the date, time periods and camera viewed with the details of the third party, date access requested, and date released / viewed.
Should a recording be required as evidence, a digital copy may be released to the police in accordance with the following procedures:

- Each recording must be identified by a unique mark or saved in a file that is encrypted
- Only accessible to the Headteacher / responsible person
- If a CD/Pen Drive is used to record footage, they must be new and unused.

The Headteacher / responsible person shall register the date and time of the recording. A recording required for evidential purposes must either be sent via the Headteacher's email address (which will be encrypt) or sealed, witnessed, signed by the Headteacher / responsible person, dated and stored in the school safe. Recordings will only be released to the police on the clear understanding that the footage remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this policy and the Data protection Act 2018. The school retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained thereon. The police may require the school to retain the stored recordings for possible use as evidence in the future. Such recordings will be properly registered and securely stored in the school safe until they are needed by the police. Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Headteacher. In these circumstances recordings will normally be released where satisfactory documentation is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.

9. Responsibilities

Head Teacher / Data Protection Lead will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school.
- Ensure that all new and existing CCTV monitoring 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 (e.g. an access log) to or the release of any material recorded or stored in the system.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy.

- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that images recorded on pen drives/digital recordings are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on pen drives/digital recordings are stored for a period not longer than 60 days and are then erased unless required as part of a criminal investigation, court proceedings (criminal or civil) or approved SAR.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas.
- Ensure that the time is checked for accuracy and amended if necessary on a regular basis. All checked/amendments should be logged.

10. Privacy impact assessments and privacy by design

CCTV has the potential to be privacy intrusive. The school will perform a privacy 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. Complaints

Complaints and enquires about the provision of CCTV within the school should be directed to the Headteacher.

12. Policy review

The Data Protection officer is responsible for monitoring and reviewing this policy. This policy will be review annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews. This policy shall be regularly reviewed on a biannual basis unless there is a change in provision.