**Baguley Hall Primary School**



**CCTV Policy**

*Date of Policy approval \_\_\_\_\_\_\_\_\_22nd May 2017\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

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*Signed \_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (Headteacher)*

**Baguley Hall Primary School**

**CCTV Policy**

**1 Introduction**

1. Baguley Hall Primary School uses closed circuit television (CCTV) images to reduce crime and

monitor the 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.

1.2 The system comprises a number of fixed and dome cameras.

1.3 The system does not have sound recording capability.

1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by

 the school’s leadership team.

1.5 The CCTV is monitored centrally from the school.

1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the

 school community.

1.7 The school’s CCTV Scheme is registered with the Information Commissioner under the terms of the

 Data Protection Act2018 and the General Data Protection Regulation (GDPR) 2018..

 1.8 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 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

**2 Objectives of the CCTV Scheme**

Along with a range of measures, the CCTV system will be used to:

2.1 Help maintain an environment for students, staff and others, which supports their safety and welfare

2.2 Deter crime against persons, and against the school buildings and school assets

2.3 Assist in the identification and prosecution of persons having committed an offence

**3 Statement of Intent**

* 1. The school will treat as data all CCTV recordings and relevant information

3.2 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 in writing for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

3.3 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. The Code of Practice is published at:

https://ico.org.uk/media/about-the-ico/consultations/2044/draft-cctv-cop.pdf

3.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

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 Operation of the system**

4.1 The CCTV system will be in operation 24 hours each day, for every day of the year

4.2 The Site Manager will check on a weekly basis that the system is operating effectively and in particular that the equipment is properly recording and that cameras are functional. They system will be regularly serviced and maintained. Defects will be reported to the servicing company at the earliest convenient opportunity.

**5 Siting the Cameras**

5.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (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 images captured comply with the Data Protection Act.

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

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

5.4 Members of staff should 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:**

1. ***Protection of school buildings and property:*** The building’s perimeter, entrances and exits, lobbies and corridors
2. ***Video Patrol of Public Areas:*** Car park

**6 Covert Monitoring**

6.1 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.

6.2 In these circumstances authorisation must be obtained from a member of the senior leadership team.

6.3 Covert monitoring must cease following completion of an investigation.

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

**7 Storage and Retention of CCTV images**

7.1 The main control of the facility must be kept secure

7.2 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.

7.3 All retained data will be stored securely.

**8 Access to CCTV images**

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

8.2 A record will be maintained of the release of the images to the Police or other authorised applicants. A register will be available for this purpose

8.3 Viewing of images by the Police must be recorded in writing and in the log book. Requests by the Police can be allowable under section 29 of the Data Protection Act (DPA) 1998.

**9 Subject Access Requests (SAR)**

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

9.2 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.

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

9.4 The school does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available

9.5 The school will respond to requests within 30 calendar days of receiving the written request and fee.

9.6 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.

**10 Access to and Disclosure of Images to Third Parties**

10.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

10.2 Requests should be made in writing to the Headteacher.

10.3 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.

**11 Data Protection Impact Assessments and Privacy by Design**

CCTV has the potential to be privacy intrusive. 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.

**12 Complaints**

11.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

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

• CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office) • [www.ico.gov.uk](http://www.ico.gov.uk)

• Regulation of Investigatory Powers Act (RIPA) 2000

• Data Protection Act 1998

13 Links with other policies

* Data Protection Policy
* Freedom of information policy
* Subject Access Request Policy
* Safeguarding policy
* GDPR 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.
* The contact telephone number or address for enquiries.

Example sign

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WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, 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 ………<phone number>…………