



**Sandbank & Valley Nursery Schools Federation**  
**C.C.T.V. Policy**

<b>Date Produced</b>	September 2024
<b>Original Author</b>	Sohila Bibi
<b>Version</b>	1.0
<b>Review Due</b>	May 2027
<b>Updated</b>	
<b>Reviewer</b>	
<b>Date approved by Governors</b>	

## Contents

<b>1. Introduction</b> .....	3
1.0 Objectives of the CCTV Scheme .....	3
1.1 Definitions .....	4
<b>2. CCTV</b> .....	6
2.0 Statement of Intent.....	6
2.0.1 Siting the cameras.....	6
2.1 Covert Monitoring.....	7
2.2 Operation of the System .....	7
2.3 Controls and Hardware .....	8
2.4 Access to CCTV Images.....	8
2.5 Storage & Retention of CCTV Images .....	10
<b>3. Subject Access Requests</b> .....	9
3.1 Access to and disclosure of Images to Third Parties.....	9
<b>4. Breaches of the Code</b> .....	10
<b>5. Complaints</b> .....	10
<b>6. Further Information</b> .....	10

## 1. Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at our schools.

- The CCTV system is owned and operated by the school, and it's deployment is determined by the school's management team.
- The system comprises a number of 4 fixed cameras located around the school site. All cameras are monitored from a Central Site Office [school admin office] and are only available to designated staff; members of the Senior Leadership, Management Team and Admin Team.
- 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 by the School Admin staff 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.
- Any changes to CCTV monitoring will be subject to consultation with board of Governors.
- This policy follows Data Protection Act 2018 (DPA) and General Data Protection Regulations (GDPR) 2016 guidelines.
- The school's CCTV Scheme is registered with the Information Commissioner under the terms of the DPA 2018 and the GDPR 2016. This policy outlines the school's use of CCTV and how it complies with UK and other relevant legislation.
- The policy will be subject to review to include consultation as appropriate with interested parties.

### 1.0 Objectives of the CCTV Scheme

The system has been installed by the school with the primary purpose of reducing the threat of crime generally, protecting our premises and helping to ensure the safety of all of our staff, students and visitors consistent with respect for the individuals' privacy.

- To increase personal safety of staff students and visitors and reduce the fear of crime
- To deter those with criminal intent and protect the school buildings and their assets
- To assist in the prevention and detection of crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property

The system will not be used:

- To provide recorded images for the world-wide-web.
- Where there is an extra expectation of privacy such as toilets and changing rooms.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking

Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

### 1.1 Definitions

Term	Definition
<b>Personal data</b>	<p>The General Data Protection Regulation (GDPR) only applies to organisations' use of personal data. This is any information relating to an identified, or identifiable, person.</p> <p>This may include information such as the person's:</p> <ul style="list-style-type: none"><li>• Name</li><li>• Contact details</li><li>• Identification number</li><li>• Online identifier, such as a username</li></ul> <p>It may also include anything relating to the person's physical and mental health, genetics, finances, or their physiological, cultural, or social identity.</p>
<b>Special categories of personal data</b>	<p>Personal data which is considered to be more sensitive and therefore requires further safeguards:</p> <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Political opinions</li><li>• Religious or philosophical beliefs</li><li>• Trade union membership</li><li>• Genetic data</li><li>• Biometric data where used for identification purposes (such as fingerprints, retina and iris patterns)</li><li>• Health – physical or mental</li><li>• Sex life or sexual orientation</li><li>• Criminal offences and procedures</li></ul>

<b>Processing</b>	Anything operation or set of operations performed on personal data including: collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
<b>Data Subject</b>	The identified or identifiable individual to whom the personal data relates (e.g. all your pupils, staff members will be data subjects).
<b>Data Controller</b>	A person or organisation that determines the purposes and means of processing of personal data (e.g you as a school)
<b>Data Processor</b>	An external person or organisation, who is <b>not</b> employed by your school, who processes the personal data on your school's behalf (e.g. your payroll provider, an external careers advice service, or your parental communications provider).
<b>Data Protection Officer</b>	The person in your school, or an external data protection adviser, who takes responsibility for monitoring data protection compliance.
<b>Personal data breach</b>	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

## 2. CCTV

### 2.0 Statement of Intent

The CCTV Scheme will be registered with the Information Commissioner under the terms of the DPA 2018 and will seek to comply with the requirements of the DPA, GDPR and the Commissioner's Code of Practice.

- The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- Cameras will be used to monitor activities within the school and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
- 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, as set out in the Regulation of Investigatory Power Act 2000.
- Materials or knowledge secured as a result of CCTV will not be used for any co - investigation of a specific crime, without the written authority of the police. The school will not release images to the media for purposes of entertainment.
- 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.
- 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.

#### 2.0.1 Siting the Cameras

- 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.
- The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include indoor and outdoor areas.
- CCTV will not be used in classrooms.

- Members of staff should have access to details of where CCTV cameras are situated.
- The exception stated in the Code of Practice is if cameras are placed for the purpose of covert monitoring (see below).

## **2.1 Covert Monitoring**

2.1.1 The school may allow police to install covert cameras in school for a specific authorised purpose subject to the police acting in accordance with the Regulation of Investigatory powers (RIPA). For example:

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

2.1.2 In these circumstances authorisation must be obtained from the Headteacher or Deputy Headteacher.

- (a) Covert monitoring must cease following completion of an investigation.
- (b) Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets, unless there is a serious need for this.

## **2.2 Operation of the System**

The Scheme will be administered and managed by the Headteacher or her nominee, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of both the Senior Leadership & Management Team (SLMT) and the Admin Team during the day and the Keyholder out of hours and at weekends. The CCTV controls and hardware devices will only be accessed by SLT and the Admin Team. The CCTV system will be operated 24 hours each day, every day of the year.

## **2.3 Controls and Hardware**

- The Admin Team will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- Access to the CCTV controls and hardware devices will be strictly limited to the SLT & the Admin Team.
- Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- Visitors and other contractors wishing to access the CCTV controls and hardware devices will be subject to particular arrangement as outlined below.
- CCTV Operators must satisfy themselves over the identity of any visitors and other contractors wishing to access the CCTV controls and hardware devices and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be endorsed in a log book.
- It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors must first obtain permission from the Office Manager, or her deputy and must be accompanied by her throughout the visit.
- Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- If out of hours emergency maintenance arises, the school must be satisfied of the identity and purpose of contractors before allowing entry.
- A visitors record will be maintained at school reception. Full details of visitors including time/data of entry and exit will be recorded.
- Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.

## **2.4 Access to CCTV Images**

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

A record book will be kept by the Admin Team, recording any incidents or searches. This register will include the following:-

- the purpose of any searches and whether the search was successful or not
- who carried out search



- persons present (particularly when reviewing).
- date, start and end time of the incident.
- date and time of the review
- any other relevant information

## 2.5 **Storage & Retention of CCTV Images**

Recorded data will not be retained for longer than is necessary, 25 calendar days. 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.

All retained data will be stored securely on the network with restricted access.

## 3 **Subject Access Requests**

Individuals have the right to request access to CCTV footage relating to themselves under the General Data Protection Regulation.

- All requests should be made in writing to the Executive Headteacher, Ms Dawn Kelly. 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.
- The school will respond to requests within 1 month of receiving the request.
- 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.

### 3.1 **Access to and Disclosure of Images to Third Parties**

- 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).

- Requests should be made in writing to the Headteacher.
- 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.

#### **4. Breaches of the Code (including major breaches of security)**

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action. Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

#### **5. Complaints**

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

#### **6. Further information**

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

- CCTV Code of Practice (published by the Information Commissioners Office)
- For further guidance from the ICO go to <https://ico.org.uk/for-organisations/guide-to-data-protection/encryption/scenarios/cctv>
- Data Protection Act 2018
- General Data Protection Regulation 2016