Airedale Junior School

Ambition · Bravery · Respect

CCTV

Policy

Contents:

1. Purpose

The purpose of this policy is to regulate the management, operation and use of CCTV system (closed Circuit Television) at Airedale Junior School, hereafter referred to as 'the school'.

CCTV systems are installed externally on the 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 system is in operation within the external environment of the premises and this operates 24 hours a day.

Due to the school sharing a site, the system is shared with Airedale Junior School and Townville Infants to be able to give as full a coverage as possible. CCTV surveillance at the school is intended for the purpose of:

- Protecting the school buildings and school assets, both during and after school hours
- Promoting the health and safety of staff, pupils and visitors
- Reducing the incidence of crime and anti-social behaviour
- Supporting the police in a bid to deter and detect crime
- Assisting in identifying, apprehending and prosecuting offenders
- Ensuring that the school rules are respected so that the school can be properly managed

The system does not have sound recording capability.

The system is owned by the three schools and is maintained by a professional company. It is also monitored externally 24 hours.

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 with access to images are aware of the procedures that need to be followed when accessing the recorded images.

2. Scope

This policy relates directly to the location and use of 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 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 sign will be clearly and prominently placed at the entrance and around the school site.

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 Equality + Diversity, dealing with complaints and other relevant policies.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individuals' reasonable expectation to privacy. Privacy settings are in place in areas that require this to ensure that an individual's privacy is not violated.

3. Location of Cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed, 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.

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

- **Protection of school building and property:** The building's perimeter, entrances and exits
- **Video Patrol of Public Areas:** Parking areas, main entrance/exit gates
- **Criminal Investigation(carried out by the police) –** Robbery and theft surveillance

4. Storage and retention of CCTV Images

The system automatically overwrites following a period of approx 6 weeks depending on the amount of recording and space it takes up on the system. Recorded data will not be retained for longer than this except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained, an electronic file held on a secure server where specific CCTV image/recordings are retained will be kept. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the school's purposes for recording information, and how long it is needed to achieve this purpose.

The school will store data securely at all times.

5. 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 Business Manager. The Business Manager may delegate the administration of the CCTV system to the Deputy Business Manager or a member of the Senior Leadership Team. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need to know basis.

6. Subject Access Requests

- Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and GDPR.
- All requests should be made in writing to the Data Protection Officer who can be contacted at the school address. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, time, date and location.
- The school does not have a facility to provide copies of CCTV footage but instead the applicant may be able to view the footage if available.
- The school will respond to requests within 30 days 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 on-going investigation.

7. 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 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. However, very careful consideration must be given to exactly what the court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.
- Requests for images should be made in writing to the Data Protection Officer.
- 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.

8. Responsibilities

The Headteacher 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 all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- 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 monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy.
- 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"

9. Policy review

The data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

Reviewed: July 2020

Next review date: July 2021

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