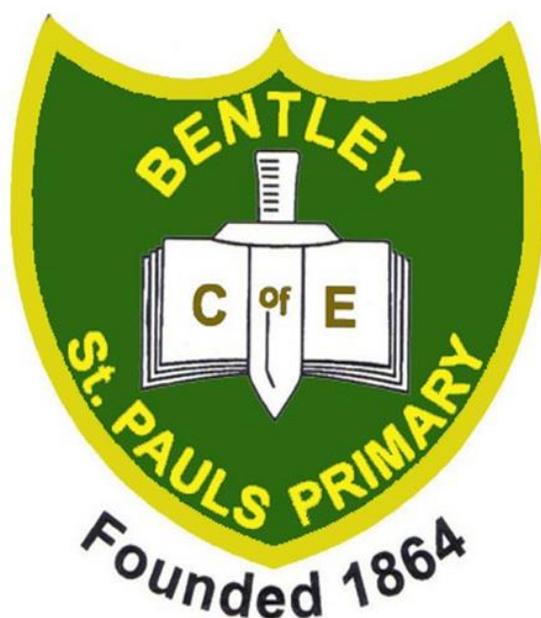


BENTLEY ST PAUL'S C OF E PRIMARY SCHOOL

POLICY FOR CCTV



'Growing together in faith, love and trust, we will succeed.'

Date of Policy: June 2017

Date of Review: June 2019

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1 Introduction

- 1.1 Bentley St Pauls Primary School uses closed circuit television (CCTV) images to monitor the school buildings to help provide a safe and secure environment for pupils, staff and visitors, and to help prevent the loss or damage to school property.
- 1.2 The system comprises a number of fixed and dome cameras supplemented by security lighting.
- 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 the cameras is determined by the Site manager and Headteacher.
- 1.5 The CCTV is monitored centrally from the Headteacher's office.
- 1.6 Any changes to CCTV monitoring will be subject to consultation with staff.
- 1.7 The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images is covered by the Data Protection Act 1998. This policy outline complies with the Act.
- 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 trained by the Site 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 Statement of Intent

- 2.1 The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure its CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

http://www.ico.gov.uk/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.ashx

- 2.2 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.
- 2.3 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.

3 Siting the Cameras

- 3.1 Cameras will be sited so they cover each external door of the school and its outbuildings and will only capture images relevant to the purposes for which they are installed (described above). 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.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 3.3 Members of staff should have access to details of where CCTV cameras are situated, with the possible exception of cameras placed for the purpose of covert monitoring.

4 Covert Monitoring

- 4.1 Currently the school does not use covert monitoring but it 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.
- 4.2 In these circumstances authorisation must be obtained from the school's Governing Body.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

5 Storage and Retention of CCTV images

- 5.1 Recording of images commences for each camera when it detects movement within its range of vision and continues until a period of non-movement occurs. Images are recorded on a hard disk drive within the control unit. When the hard disk becomes full, the system automatically begins over-writing the oldest images. It is estimated that this will provide up to two weeks of images.
- 5.2 There is a facility for copying images onto removable disks for longer retention or to allow them to be passed to an authorised and relevant outside organisation (e.g. the police). Copied 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.
- 5.3 All retained data will be stored securely.

6 Access to CCTV images

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

6.2 All viewing of recorded data will be logged

6.3 Currently only the Headteacher and the Site manager are authorised to view recorded images but these may authorise other individuals if appropriate.

7 Subject Access Requests (SAR)

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

7.2 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.

7.3 The school will respond to requests within 5 calendar days of receiving the written request and fee.

7.4 A fee of £10 will be charged per request.

7.5 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.

7.6 Access requests must be made in a timely manner given that images are normally only available for two weeks before being over-written automatically.

8 Access to and Disclosure of Images to Third Parties

8.1 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).

8.2 Requests should be made in writing to the Headteacher.

8.3 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.

9 Complaints

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

Further Information

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
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998 [\[1\]](#)

Appendix A - Checklist

This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Bentley St Pauls Primary School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of pupils, staff and visitors. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.	Yes	HT	
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes		
Staff and members of the school community will be consulted about the proposal to install additional CCTV equipment	Yes		
Cameras have been sited so that they provide clear images.	Yes		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes, where possible		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Yes		
Except for law enforcement bodies, images will not be provided to third parties.	Yes		
The school knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as a request is made	Yes		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes		

Appendix 2

Bentley St Paul's C of E Primary School

CCTV RECORD OF VIEWING RECORDED DATA	
Date of Viewing:	By:
Others present:	
Start date and time of data:	End date and time of data:
Was data copied? YES / No	If yes – was data taken off site? YES / NO By Whom? Signature: Ref number:
Additional Information: (e.g. purpose of viewing and result)	

Appendix C –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:

- That the area is covered by CCTV surveillance and pictures are recorded
- The name of the school
- The contact telephone number or address for enquiries

