

TOWNVILLE INFANTS' SCHOOL

Head teacher: Caroline Burden

Kindness - Determination - Resilience - Teamwork - Communication - Respect

'Together we learn - United we achieve'

CCTV Policy

Approved by:	Date:
Last reviewed on:	January 2023
Next review due by:	January 2024

1 Introduction

- 1.1 Townville Infants 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 leased by Airedale Infants, Airedale Juniors and Townville Infant School, the deployment of which is determined by the Headteacher.
- 1.5 The CCTV is monitored centrally from the school office by the School Business Manager.
- 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 GDPR 2018. This policy outlines the school's use of CCTV and how it 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 school data controller 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 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.
- 2.2 CCTV warning signs are clearly and prominently placed, including at the school gates.
- 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 are sited so they only capture images relevant to the purposes for which they are installed, and care is be taken to ensure that reasonable privacy expectations are not violated. The School ensures that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.
- 3.2 The school makes every effort to position cameras so that their coverage is restricted to the school premises.
- 3.3 CCTV is not used in classrooms, only outside areas.

4 Covert Monitoring

- 4.1 The school may in exceptional circumstances set up covert monitoring. For example: Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place.
- 4.2 In these circumstances authorisation will be obtained from the Headteacher.
- 4.3 Covert monitoring will cease following completion of an investigation.

5 Storage and Retention of CCTV images

- 5.1 Recorded data is not 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.
- 5.2 All retained data is stored securely.

6 Access to CCTV images

- 6.1 Access to recorded images is restricted to those staff authorised to view them, and will not be made more widely available. Staff who have access to the CCTV system are: The Headteacher and Business Manager.
- 6.2 The School will be open to data breaches if a third party can distribute, or remove, personal data in the form of CCTV images without following correct procedure. Under the GDPR, data breaches must be reported within 72 hours.

7 Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under GDPR regulations. If any other individuals are visible in the footage, then a footage redaction service will be provided i.e. to blur out the faces of other individuals.
- 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 40 calendar days of receiving the written request and fee.
- 7.4 A fee of £10 will 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.

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 on the school site 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 2018 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2018
- GDPR Regulations 2018