



# **Watlington Community Primary School**

## **Closed Circuit TV (CCTV) Policy**

### **Growing and Learning Together**

Approved by Governors: 9<sup>th</sup> November 2021

To be reviewed November 2023

# **CCTV Policy**

## **1. Rationale**

1.1 With support from Norfolk Council Council's Children's Services, the school has CCTV to protect and safeguard staff, pupils and premises. This was initiated after a number of incidents including a hate crime on the premises and abuse that has been directed towards staff.

1.2 The main legislation in this area is the General Data Protection Regulation, (GDPR) which came into effect on 25 May 2018.

## **2. Aims**

2.1 The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) at Watlington CP School. It also serves as a notice and a guide to data Subjects (pupils, parents, staff, volunteers, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV.

2.2 The system is administered and managed by the school, as the Data Controller. This policy is reviewed regularly and should be read in reference to the schools GDPR policy and Privacy Notice (available on our website). We will conduct an annual audit of the CCTV using the checklist in Appendix 2 of the Information Commissioners Office (ICO's) CCTV Code of Practice. <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

2.3 The schools purposes of using the CCTV system are set out below, and, having fully considered the privacy rights of individuals, the school believes these purposes are all in its legitimate interests. Data captures for the purposes below will not be used for commercial purposes.

## **3. Objectives of the System**

- To protect the personal safety of pupils, staff, volunteers, visitors and members of the public.
- To protect the school buildings and equipment, and personal property of pupils, staff, volunteers, visitors and members of the public
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the school site and deliveries and arrivals, so that the school can ensure that these have legitimate entry to the school for safeguarding purposes.

## **4. Positioning**

4.1 Locations have been selected outside and in the school foyer that the school reasonably believes require monitoring to address the stated objectives. Adequate signage has been placed in prominent positions to inform staff, pupils and visitors that the school is monitored. No images will be captured from areas in which individuals would have a heightened expectation of privacy. No images of public spaces will be captured except to a limited extent at the site entrance at the front of the school.

4.2 The school has 4 cameras all of which are equipped with IR night vision and are vandal and weather proof. Camera in the foyer captures both image and audio. They are positioned as follows:

- Front entrance – includes ANPR (Automatic Number Plate Recognition)
- By staff room
- Rear of building
- Foyer – includes both audio and visual recording.

## **5. Maintenance**

5.1 The CCTV will be operational 24 hours a day, 365 days a year. The System Manager (The Headteacher) will check and confirm that the System is recording and that cameras are functioning correctly, on a regular basis. The System will be serviced regularly as part of the normal maintenance contract by the supplier, The Alarm Company, as part of the Buildings Maintenance Contract.

5.2 The Headteacher and Secretary are trained in operating, recording and retaining images taken. They are aware of the procedure for handling requests for the disclosure of an image by individuals, where the school's procedure is set out in our GDPR policy.

5.3 Images can only be viewed and/or monitored in either the server room, Headteacher's office or main office to minimize the likelihood of or opportunity for access to unauthorised persons.

## **6. Storage of Data**

6.1 The day to day management of images will be the responsibility of the Headteacher, who acts as the System Manager, or a suitable person as the System manager shall appoint in her absence. Images are stored up to 40 days and automatically overwritten unless the school considers it reasonably necessary for the pursuit of the objectives outlines above, or if lawfully required by a third party such as the Police where such data is retained, it will be retained, it will be retained in accordance with the Act and our GDPR and Privacy Policy. Information such as date, time and length of any recording if applicable as well as locations covered and groups of individuals recorded will be recorded. This will be kept in the school office.

## **7. Access to Images**

7.1 Access to stored images will only be given to authorized persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). Individuals also have the right to access personal data the School holds on them (please see the GDPR and Privacy Notices on the website) including information held on the system, if it has been kept. The school will need specific details including at least time, date and camera location before it can respond to any such requests. This right is subject to certain exemptions from access, including some circumstances where others are identifiable.

7.2 The System manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System manager may authorise access to CCTV images:

- When required to do so by the Police or some relevant authority
- To make a report regarding suspected criminal behaviour
- To enable the DSL or Alternate DSLs to examine behaviour that may give rise to any safeguarding concerns.

- To the Schools Insurance Company where required in order to pursue a claim for damage done to insured property
- To data subjects (or their representatives) pursuant to a Subject Access Request as above.

7.3 Where images are disclosed these are recorded in the log book, including the person who viewed the image, time of access, reason for viewing the images, details of the image viewed and a crime incident number (if applicable)

7.4 If images are provided to third parties, wherever practicable, steps will be taken to obscure images of non-relevant individuals.

7.5 The following have direct access to CCTV:

- Headteacher
- Secretary
- Caretaker

## **8. Complaints and Queries**

8.1 Queries in relation to the CCTV should be referred to the school office.

8.2 Complaints should be dealt with as stated in the Complaints Policy

8.3 This Policy should be read in conjunction with the GDPR policy and Privacy Notices.