

CCTV Policy



The Cottesloe School

Policy Type:	Non- Statutory
Reviewed by:	Simon Jones (Headteacher), Nicola Hulland (Business Manager) and Carolyn Stirk (Policies Governor)
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1. Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defence of any litigation proceedings
- The CCTV system will not be used to:
 - Encroach on an individual's right to privacy
 - Monitor people in spaces where they have a heightened expectation of privacy (including toilet cubicles, washbasins and changing rooms - see Section 5)
 - Follow particular individuals, unless there is an ongoing emergency incident occurring
 - Pursue any other purposes than the ones stated above

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects. In the event of a police request for information, only the minimum amount of footage will be shared with the police in order to assist them in their work.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000 (partly superseded)
- Investigatory Powers Act 2016
- The Protection of Freedoms Act 2012
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2.2 Guidance

- Surveillance Camera Code of Practice (2021)

3. Definitions

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

4. Covert surveillance

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

Additionally, the proper authorisation forms from the Home Office will be completed and retained where necessary.

Our GDPR lawful basis for processing personal data through the use of CCTV in our school is a 'public task'. Public task applies to the processing of personal data which

is necessary to perform a task in the public interest or for our official functions, duties and powers as a school (and there is a clear basis in law for those tasks and functions).

Our school has a statutory duty to safeguard the safety and welfare of all students and staff. The use of CCTV, as set out in this Policy, is a necessary and proportionate part of how we do this.

5. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

Cameras are located in the following locations:

Reception E4 PA3 PA4 PA5 E block field Staff room corridor Reception corridor Boiler room car park A5 A upstairs corridor DT corridor A block toilets 2 Science toilets 2 A block toilets 1 Art stairs 6th form 2 Drama 2 B toilets 1 Drama 1 Drama2 B toilets 2 B block entrance 1 B block ent2 external B toilets 2 Lockers 2 Dining room 1 Team Hub	B block stairwell 1 B block stairwell 2 B 13 PA4 External Old food cabin Safeguarding office external DT4 External A3 corridor S7 external S8 external S3 Corridor Science toilets 1 Dining toilets S9 S9 External 6th form external 1 6th form external 2 6th form external 3 6th form external 4 6th form external 5 6th form external 6 6th form corridor 4 6th form study 3 6th form study 4 6th form study 2 6th form toilets 6th form study 1 6th form corridor 1
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Science entrance 1 Science entrance 2 Dining room 2 E block entrance 1 E block hall E block field 1 E block field 2 E block toilets 1 E block toilets E block corridor 1 E block corridor 2 B block upstairs B block entrance 2 Library Dining room 3 Dining room external Reception external Dining room 4 B 16 Gym corridor Car Park	6th form corridor 2 6th form external 8 6th form external 7 6th form study 5 6th form corridor 3 LSR B block girls toilet B block boys toilet Canteen counter 1 Canteen counter 2 Coach park 2 Lockers 1 B3 B block ent 1 external Library doors Canopy PA1 dance studio Coach Park3 The Base 1 The Base 2 Gates dining room side Resources gate
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To enhance student safety and reduce opportunities for anti-social behaviour and bullying, the school will use CCTV cameras in the common areas including playgrounds, corridors, canteen and dining facilities. Cameras will also be strategically positioned to monitor entry and exit points to toilet blocks and communal open spaces within toilet blocks, without encroaching on individual privacy within toilet cubicles, changing areas or washbasins. The aim of this measure is to deter and, where necessary, identify individuals involved in activities that compromise the well-being and safety of our students. We believe this approach provides a crucial layer of additional protection against unwanted behaviours, ensuring a safer and more respectful environment for everyone.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system
- Identifies the school as the data controller
- Provides contact details for the school

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

6. Roles and responsibilities

6.1 The governing board

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

6.2 The headteacher

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the data protection lead (DPL) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Access to CCTV will be limited to a minimum number of staff, see Section 9
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training in the use of the system and in data protection
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPL and taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPO and/or the DPL, whether to comply with disclosure of footage requests from third parties

6.3 The data protection officer and school data protection lead

The data protection lead will:

- Ensure persons with authorisation to access the CCTV system and footage are trained in the use of the system and in data protection
- Ensure all staff are trained to recognise a subject access request
- Deal with subject access requests in line with the UK GDPR
- Monitor compliance with UK data protection law
- Advise on and assist the school with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office
- Conduct data protection impact assessments
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner

- Ensure footage is destroyed when it falls out of the retention period unless it is needed in relation to an investigation, see Section 8
- Keep accurate records of all data processing activities and make the records public on request
- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period
- Receive and consider requests for third-party access to CCTV footage

6.4 The system manager

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

7. Operation of the CCTV system

The CCTV system will be operational 24 hours a day, 365 days a year.

The system is registered with the Information Commissioner's Office.

The system will not record audio.

Recordings will have date and time stamps.

This will be checked by the system manager termly and when the clocks change.

8. Storage of CCTV footage

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

The DPL will carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period.

9. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals from outside the organisation that access the footage must have their name, the date and time, and the reason for access recorded in the access log by the Data Protection Lead

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

9.1 Staff access

The following members of staff have authorisation to access the CCTV footage:

- The Headteacher
- The Head of School
- Deputy Head of School
- The Assistant Headteacher Character
- The Heads and Assistant Heads of Year
- The Data Protection Lead
- The Site Manager (system manager)
- Anyone with express permission of the headteacher; their name, date, time and reason for access will be recorded on the access log

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

9.2 Subject access requests (SAR)

According to UK GDPR and Data Protection Act 2018, individuals have the right to access any CCTV footage of themselves.

- Upon receiving the request the school will immediately issue a receipt and will then respond within a calendar month
- All staff have received training to recognise SARs.
- When a SAR is received staff should inform the DPL (Data Protection Lead) by email

- When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.
- The school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.
- A request may also be refused if the school is unable to obscure images that may identify other individuals and their data privacy rights are judged to override those of the requester.
- The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded or excessive.
- Footage that is disclosed in a SAR will only be available to view in school
- Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the Information Commissioner's Office(ICO) website.

<https://ico.org.uk/for-the-public/getting-copies-of-your-information-subject-access-request/>

9.3 Third-party access

- CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).
- Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).
- All requests for access should be set out in writing and sent to the headteacher and the DPL, unless it is done by a third party with the necessary authority
- The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The headteacher will consider very carefully how much footage to disclose, and seek legal advice if necessary. All footage will be shared in a secure way.
- The DPL will ensure that any disclosures that are made are done in compliance with UK GDPR.
- All disclosures will be recorded by the DPL.

10. Data protection impact assessment (DPIA)

- The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.
- The system is used only for the purpose of fulfilling its aims (stated in section 1.1).
- When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.
- The DPO will provide guidance on how to carry out the DPIA. The DPIA will be carried out by the school's data protection lead
- DPIA will be reviewed annually and/or whenever cameras are moved, and/or new cameras are installed.
- If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

11. Security

- The Site Manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults once a term
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage is password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible
- Any requests for footage that are approved for sharing will be done so in a secure way

12. Complaints and concerns

Complaints should be directed to the headteacher or the DPL and should be made according to the school's complaints policy.

13. Monitoring

The policy will be reviewed annually by the Headteacher to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

14. Links to other policies

Data protection policy

Privacy notices for parents, pupils, staff, governors and suppliers

Safeguarding and Child Protection policy

15. Review of policy

This policy will be reviewed annually (earlier if any legislative change).