



CCTV Policy

Adoption by Governing Body

..... (Signature of Chair of Governors)

.....September 2019..... (Date)

To Be RevisedSeptember 2020.....(Date)

INTRODUCTION

Closed Circuit Television System (CCTV) is installed in Squirrels Heath Junior School. New CCTV systems may be introduced in consultation with staff and the governing body if appropriate to do so. Where systems are already in operation, their operation will be reviewed regularly in consultation with staff and the governing body.

PURPOSE OF POLICY

“The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring the internal environment of the premises under the remit of Squirrels Heath Junior School.”

CCTV systems are installed (internally) in 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 security system is in operation within the premises during both the daylight and night hours each day. CCTV surveillance at Squirrels Heath Junior School is intended for the purposes 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 (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

GENERAL PRINCIPLES

Squirrels Heath Junior School as the corporate body has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, children and invitees to its premises. Squirrels Heath Junior School has a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

Information obtained through the CCTV system may only be released when authorised by the Head Teacher following consultation with the Chairperson of the Board of Governors. Any requests for CCTV recordings/images from the police will be fully recorded and legal advice will be sought if any such request is made if appropriate to do so. If a law enforcement authority, such as the police is seeking a recording for a specific investigation, they may require a warrant and accordingly any such request made by them should be requested in writing and the school will immediately seek advice from the Local Authority.

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 Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a child attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Squirrels Heath Junior School.

Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts 1988 and 2003.

JUSTIFICATION FOR USE OF CCTV

Section 2(1)(c)(iii) of the Data Protection Acts requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that Squirrels Heath Junior School needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV for security purposes has been deemed to be justified by the board of governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

In addition the Head Teacher has demonstrated that there is a proven risk to security and/or health & safety and the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

LOCATION OF CAMERAS

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Squirrels Heath Junior School has endeavoured to select locations for the installation of CCTCV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas in (Squirrels Heath Junior School) may include the following:

- **Protection of school buildings and property:** The building's entrances and exits, lobbies and corridors, special storage areas.
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Criminal Investigations (carried out by police):** Robbery, burglary and theft surveillance

COVERT SURVEILLANCE

Squirrels Heath Junior School will not engage in covert surveillance.

Where the police request to carry out an act of covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by the police will be requested in writing and the school will seek legal advice.

NOTIFICATION – SIGNAGE

The Head Teacher will provide a copy of this CCTV Policy on request to staff, parents and visitors to the school. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. The location of CCTV cameras will also be indicated to the Board of Governors. Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to property.



CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of Squirrels Heath Junior School and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police if required to do so. This scheme is controlled by Squirrels Heath Junior School For more information contact 01708 446472.

Appropriate locations for signage will include:

- at entrances to premises
- reception area

STORAGE & RETENTION

Section 2(1)(c)(iv) of the Data Protection Acts states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (30 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Head Teacher. The Head Teacher may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the police, the Deputy Head Teacher, other members of the teaching staff, representatives of the Department of Education, the local authority and/or the parent of a recorded child). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

ACCESS

CCTV monitoring equipment will be securely stored in the office area. The area will be locked at the end of the school working day.

Access to the CCTV system and stored images will be restricted to authorised personnel only i.e. Office Manager, Head Teacher and Deputy Head Teacher. In relevant circumstances, CCTV footage may be accessed:

- By the police where Squirrels Heath Junior School is required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Squirrels Heath Junior School's property, or
- To the LA or any other statutory body charged with child safeguarding; or
- To assist the Head Teacher in establishing facts in cases of unacceptable behaviour, in which case, the parents/guardians /police will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Squirrels Heath Junior School, or
- To individuals (or their legal representatives) subject to a court order.
- To the school's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Requests by the police: Information obtained through video monitoring will only be released when authorised by the Head Teacher following consultation with the Chairperson of the Board of Governors. If the police request CCTV images for a specific investigation, they may require a warrant and accordingly any such request made by the police should be made in writing and the school should immediately seek advice from the Local Authority.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing to the school Head Teacher. The school must respond **within 30 days**.

Access requests can be made to the following: Head Teacher at Squirrels Heath Junior School, Salisbury Road, Romford RM2 5TP. A person should provide all the necessary information to assist the school in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the school.

RESPONSIBILITIES

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Squirrels Heath Junior School.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Squirrels Heath Junior School.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Squirrels Heath Junior School 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 any material recorded or stored in the system
- Give consideration to both children and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Co-operate with the Health & Safety Officer of Squirrels Heath Junior School in reporting on the CCTV system in operation in the school
- Ensure that recorded images are stored in a secure place with access by authorised personnel only
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas
- Ensure that where a police request to set up mobile video equipment for criminal investigations, legal advice has been obtained and such activities have the approval of the Chairperson of the Board Governors.

SECURITY COMPANIES

The school CCTV system is controlled by Squirrels Heath Junior School and a contract re inspection and/or repair is in place.

IMPLEMENTATION & REVIEW

The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, Department of Education and feedback from parents/guardians, staff and others).

APPENDIX 1 - DEFINITIONS

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

The Data Protection Acts – The Data Protection Acts 1988 and 2003 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All school/ETB staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Data Protection Acts.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.