

BADDOW HALL INFANT SCHOOL



CCTV Policy

Ratified by Governing Body: Date: December 2022

Signed: Nick Banister-Dudley

Review Date: December 2023

Baddow Hall Infant School

CCTV Policy

Introduction

Baddow Hall Infant 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.

The system comprises of a number of fixed cameras and does not have sound recording capability.

The CCTV is owned and operated by the school, the deployment of which is determined by the Headteacher.

The CCTV is monitored from the school office and ultimately the Headteacher (as Data Controlling Officer). Changes to such monitoring will be subject to consultation with the governing body and school staff.

The CCTV system is registered with the Information Commissioner Office (ICO) for Data Protection purposes. All authorised employees with access to images are aware of the procedures that should be followed when accessing the recorded images, and are trained by the 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.

Statement of Intent

The school complies with ICO CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/about-this-guidance/>

CCTV warning signs will be clearly and prominently placed at various external points around the school site and may include the 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 infant controlled area of the site.

The CCTV system is designed to give maximum effectiveness but it cannot be guaranteed that it will cover or detect every incident within the areas of coverage.

Siting the cameras

Cameras are sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that the location of equipment and the images captured comply with current Data Protection legislation.

The school will make every effort to position the cameras so that their coverage is restricted to school premises, which will include outdoor areas and some internal areas.

Members of staff are given details of where cameras are situated, excluding those that may be placed for the purpose of covert monitoring.

Covert Monitoring

The school may, in exceptional circumstances, set up covert monitoring, e.g.

- where there is good cause to suspect the illegal or unauthorised action is taking place, or where there are grounds to suspect serious misconduct
- where notifying individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Headteacher.

Covert monitoring must stop following completion of the investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas that are reasonably expected to be private, e.g. toilet cubicles.

Storage and retention of CCTV images

Recorded data will be retained for 14 days. Whilst 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.

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

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under current legislation.

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, e.g. date, time, location.

The school will respond to requests within 1 month of receiving the written request and fee.

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.

Access to and disclosure of images to third parties

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).

Requests must be made in writing to the Headteacher.

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.

Complaints

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 ICO) www.ico.gov.uk

Regulation of Investigatory Powers Act (RIPA) 2000

General Data Protection Regulations (GDPR) May 2018

Appendix A – Checklist

The CCTV system and the images produced are controlled by the Headteacher (as Data Controller), who is responsible for how the system is used and for notifying the ICO about the CCTV system and its purpose. This is a legal requirement under current legislation.

The school has considered the need for using CCTV and have concluded that it is required for the prevention and detection of crime and for protecting the safety of all. It will not be used for other purposes and we conduct an annual review of our usage of CCTV.

	Checked (date)	Who by	Review date
Notification submitted to the ICO and next renewal date recorded.	9.12.22	Penny Barnacle	Feb 2023
There is a named individual who is responsible for the operation of the system	Y (Site manager)	Lesley Schlanker	Dec 2023
The system used produces images that law enforcement bodies (usually police) can use to investigate crime and they can easily be taken from the system when required			
The governing body and staff are consulted regarding the installation of, and changes to, the CCTV system			
Cameras are sited to produce clear images and are sited to avoid capturing images of persons not visiting the school site.			
There are visible signs showing CCTV is in operation. Where it is not obvious who is responsible for the system, contact details are displayed on the signage.	Y 9.12.22	Lesley Schlanker	Dec 2023
CCTV images are securely stored and access is limited to authorised personnel.	Y 9.12.22	Lesley Schlanker	Dec 2023
The recorded images will be retained in line with the school retention policy.	Y 9.12.22	Site manager	Dec 2023
With the exception of law enforcement agencies images will not be provided to third parties.	Y 9.12.22	Lesley Schlanker	Dec 2023
School staff are aware of how to respond to SAR's and/or where to seek further advice (ICO).	Y 9.12.22	Lesley Schlanker	Dec 2023
Regular checks are carried out by the Site Manager to ensure that the system is working and produces high quality images. System failings to be reported to the Headteacher and repair/maintenance to be organised by the Site Manager.	Y 9.12.22	Lesley Schlanker	Dec 2023

Appendix B – CCTV Signage

The school fulfils its obligations under current legislation (the Data Protection Act 2018) to notify persons entering a CCTV protected area that the area is monitored by CCTV and that images are recorded.