



CCTV Policy

February 2024

CCTV POLICY
QUEENSGATE FOUNDATION PRIMARY SCHOOL

Policy Review

This policy was adopted from the School Bus and is reviewed in full by the Governing Board on an annual basis.

The policy was last reviewed and agreed by the Governing Board on 5th February 2024

It will be reviewed again February 2025.

Approved



Signature: Head Teacher

Date: 5th Feb 2024



Signature: Chair of the Governing Board

Date: 5th Feb 2024

Policy control

Date	Amendments / additions	Reason
Feb 2021	3.2 wording amended "which includes outdoor areas"	New build
	Appendix A amended to include staff, parents and children	Previously stated customers
Mar 2023	Change of wording under the statement of Intent to include Home Office Surveillance	Update
	Section 9 Addition of Home Office	Update
Jan 2024	Section 6.1 addition of IT Technician	Update
	Addition of Legal Framework	Update

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act 2012
- The UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- 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
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010

This policy operates in conjunction with the following statutory and non-statutory guidance:

- Home Office (2021) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'
- ICO (2022) 'Video Surveillance'

1. Introduction

- 1.1 Queensgate Foundation Primary 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 of 11 fixed cameras
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.
- 1.5 The CCTV is monitored centrally from Queensgate Foundation Primary server room when necessary.
- 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 the General Data Protection Regulations (GDPR) The use of CCTV, and the associated images, is covered by GDPR. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 The CCTV system will be operated 24 hours each day 365 days a year.

2. Statement of Intent

- 2.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice and Home Office Surveillance Code of Practice November 2012 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/media/for-organisations/documents/1542/cctv-code-of-practice.pdf](https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf)

- 2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas.
- 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 will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor areas.
- 3.3 CCTV will not be used in classrooms.
- 3.4 Members of staff should have access to details of where CCTV cameras are situated.

4. Covert Monitoring

- 4.1 The school may in exceptional circumstances set up covert monitoring. For example:
 - i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
 - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from the headteacher
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

5. Storage and Retention of CCTV images

- 5.1 Recorded data will not be retained for longer than is necessary before being overwritten. 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 will be stored securely.

6. Access to CCTV images

- 6.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available i.e. Headteacher, Deputy Headteacher, Business Manager, IT Technician and Site Manager.

7. Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under GDPR.
- 7.2 All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information, as noted in GDPR to enable the footage relating to them to be identified. For example, date, time and location. A log will be kept detailing all requests.
- 7.3 The school will respond to SAR within one month.
- 7.4 The school will provide a copy of the information requested free of charge. However, a reasonable fee will be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive. The school may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information
- 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 ongoing 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 within the school should be directed to the Headteacher

Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office)
- www.ico.org.uk/
- Regulation of Investigatory Powers Act (RIPA) 2000
- General Data Protection Regulations
- Home Office Surveillance Code of Practice November 2021

Appendix A - Checklist

This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of GDPR).

Queensgate Foundation Primary School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of staff, parents and children. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.			
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, images will not be provided to third parties.			
The potential impact on individuals' privacy has been identified and taken into account in the use of the system			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			

Appendix B – CCTV Signage

It is a requirement of the GDPR to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

Under the GDPR, the data protection principles set out the main responsibilities for organisations.

Article 5 of the GDPR requires that personal data shall be:

- “a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Article 5(2) requires that:

“the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles, for further information refer to General Data Protection Regulations