



CCTV policy

Introduction

The purpose of this policy is to set out the operation, use, storage and disclosure of the Closed Circuit Television (CCTV) we use on the school site. It applies to all data subjects whose image may be captured by the CCTV system and should be read together with the School's *Data protection policy*, *Record of processing activity* and *Data retention schedule*. It considers applicable legislation and guidance, including, but not limited to, the;

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act (DPA) 2018;
- Video Surveillance Code of practice as produced by the Information Commissioner's Office (ICO);
- Protection of Freedom Act (PoFA) 2012;
- Human Rights Act 1998.

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1 Purpose of CCTV

We use CCTV for the following purposes:

- To provide a safe and secure environment for the school workforce, pupils and visitors.
- To protect the school buildings and assets.
- To assist in the prevention and detection of criminal activity.
- To assist law enforcement agencies in apprehending suspected offenders.

2 System operation

The CCTV system is owned and operated by the school/Woodside Security Systems Ltd (external company who supplies the system). The deployment is determined by the Senior Leadership Team, with input from the Governing Body and Data Protection Officer (DPO). We will:

- notify the ICO of our use of CCTV as part of our registration;
- complete a Data Privacy Impact Assessment if amendments are to be made to the deployment or use of CCTV;
- treat the system and all information processed on it as data which is processed under DPA 2018/UK GDPR;
- not direct cameras outside school grounds onto private property, an individual, their property or a specific group of individuals – the exception to this would be if authorisation was obtained for Direct Surveillance as set up by the Regulatory of Investigatory Powers Act 2000;
- display warning signs clearly in prominent places – specifically, at all entrances to the school site and premises, or any public areas where a passer-by may be recorded, where CCTV is in use. Where necessary these signs will include information on how to contact the school regarding information or access to the CCTV footage;
- not use CCTV footage for any commercial purposes.

2.1 There is no guarantee that this system will or can cover and detect every single incident taking place in the areas of coverage.

3 Camera Setup

The CCTV system comprises of eight cameras which record day and night covering the internal and external areas of the School. Their coverage also extends past the school boundaries to public areas.

3.1 Cameras will be placed so they only capture images relevant for the purposes for which they are installed, and all care will be taken to ensure that reasonable privacy expectations are not violated.

3.2 CCTV is not sited in classrooms except in exceptional circumstances.

3.3 Members of staff can access details of CCTV camera locations on request.

4 Covert Monitoring

We retain the right to set up covert monitoring in exceptional circumstances. For example:

- Where there is good cause to suspect illegal or serious unauthorised action(s) are taking place, or where there are grounds to suspect serious misconduct.

- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Head Teacher and Chair of Governors. Covert monitoring will cease following the completion of any investigation.

5 Storage and Retention

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of people whose images have been recorded.

- 5.1 All data will be stored securely. Recordings will be kept for one month unless there is a specific purpose for which they are required, when they will be retained for a longer period. They will be stored physically on a hard drive inside the recorder.

6 Access to CCTV Images

The ability to view live and historical CCTV footage is only to be provided at designated locations and by authorised persons.

- Specific live monitoring is limited to the main office.
- Direct access to recorded footage is limited to the Headteacher and Office Manager.
- Only in exceptional circumstances will any other individuals be allowed to view footage. The reasons for and details of these circumstances will be recorded at the time such a decision is made.

- 6.1 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the school.

7 Disclosure of Images to data subjects (Subject access requests)

Anyone recorded in any CCTV image is considered a data subject and therefore has the right to request access to those images. These requests will be considered a Subject access request, details of which can be found in our *Freedom of information policy, available on our website or from the school office on request.*

- 7.1 When such a request is made, the footage will be reviewed in accordance with the request. If the footage contains only the data subject making the request, the individual concerned may be permitted to view the footage.
- This will be strictly limited to the footage of the data subject making the request and the specific reason for the request.
- 7.2 If the footage contains images of other data subjects, the school will consider whether.
- a. The request requires the disclosure of the images of data subjects other than the requester, and whether these additional data subjects can be anonymized in the footage.
 - b. The other individuals in the footage have consented to the disclosure of the images or if their consent could be obtained.
 - If not, then whether it is reasonable in the circumstances to disclose those images to the data subject making the request.

7.3 We reserve the right to refuse access to CCTV footage where this would prejudice the legal rights of other data subjects or jeopardise an ongoing investigation.

8 Disclosure of images to third parties

We will only disclose recorded CCTV footage to third parties where there is a lawful basis to do so. Third parties acting on behalf of a data subject will be handled in accordance with the usual Subject Access Request process.

8.1 CCTV footage will only be disclosed to law enforcement agencies in line with the purpose for which the CCTV system is in place. If a request is received from a law enforcement agency for the disclosure of footage we will ask for an explanation of the reasoning for wanting to obtain the footage. This will help to enable consideration of the extent of what can appropriately be disclosed.

8.2 If an order is granted by a court for the disclosure of CCTV images, this will be complied with but consideration will be given to exactly what the order requires.

8.3 In all instances, if there are any concerns as to what should or should not be disclosed the Data Protection Officer will be contacted and further legal advice sought if necessary.

9 Data protection:

Any personal data processed in the delivery of this policy will be processed in accordance with the school Data Protection Policy. Further information can also be found in the Record of Processing Activity.

10 Concerns and complaints

We take all concerns and complaints very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance. If unhappy with our response and wish to make a complaint, please contact our independent data protection officer, David Coy (david.coy@london.anglican.org).


Alternatively, you can refer a complaint to the Information Commissioner’s Office:

- Report a concern online at: <https://ico.org.uk/concerns/>
- By phone: 0303 123 1113
- By mail: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11 Monitoring and review

This policy will be reviewed every two years, or earlier if the need arises, by the Care and Communication Committee in collaboration with the DPO.

Date of policy: JULY 2024

Policy ratified:  (Signature) 8th July 2024 (Date)
Review due: JULY 2026