



Giffards Primary School CCTV Policy

This policy was developed in the Autumn Term 2014 through a process of consultation

Agreed by Governors

December 2014, reviewed December 2016 and updated May 2018 in light of GDPR

To be Reviewed

May 2020

Signed by _____ Date _____

Giffards Primary School

CCTV Policy

see Appendix A for checklist

1 Introduction

- 1.1 Giffards Primary School uses closed circuit television (CCTV) images to reduce criminal and other actions of individuals that have a negative impact on teaching, learning and the working environment and to monitor the school buildings to prevent the loss or damage to school property and its assets. The aim is to provide a safe and secure environment for pupils, staff and visitors.
- 1.2 The system comprises a number of fixed cameras.
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- 1.5 The CCTV is monitored centrally from a secure school office by the School Business Manager, who is also one of the Data Controlling Officers. The Headteacher and Deputy Headteacher are also nominated Data Controlling Officers.
- 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 Data Protection Act 1998 and GDPR regulations from May 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 1998 and GDPR regulations from May 2018. This policy outlines the school's use of CCTV and how it complies with the Acts.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

2 Statement of Intent

- 2.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates as coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV. 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 controlled area.

- 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 – see Appendix B

- 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 Data Protection Act/GDPR May 2018.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 3.3 CCTV will only be used in areas within school that have been identified as not being easily monitored.
- 3.4 Members of staff should have access to details of where CCTV cameras are situated.

4 Storage and Retention of CCTV images

- 4.1 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 the people whose images have been recorded.
- 4.2 All retained data will be stored securely. Stored data will be destroyed as soon as possible when no longer required.

5 Access to CCTV images

- 5.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.
- 5.2 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
- 5.3 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act/GDPR May 2018.
- 5.4 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. For example, date, time and location.
- 5.5 The school will respond to requests within 30 calendar days of receiving the written request, or up to 2 months as per our Data Protection Policy..
- 5.6 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.

6 Access to and Disclosure of Images to Third Parties

- 6.1 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).
- 6.2 Requests should be made in writing to the Headteacher.
- 6.3 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.

7 Complaints

- 7.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance. Any concerns can be directed to the Data Protection Officer at dataprotection@giffardsprimary.thurrock.sch.uk
- 7.2 Any breach of this policy by school staff will be initially investigated by the Head teacher.

8. Review of policy

- 8.1 This policy will be reviewed every two years, or in light of any changes to legislation. When this policy is reviewed, a checklist will be completed along with an impact assessment (see appendix B) will be carried out to determine whether each CCTV camera is justified and the impact it is having.

Further Information

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

- 'In the Picture: A data protection code of practice for surveillance cameras and personal information.' from the Information Commissioners Office
- www.ico.gov.uk
- Data Protection Act 1998/GDPR from 26th May

Appendix A - Checklist

This CCTV system and the images produced by it are controlled by Mrs Sue Bryant, School Business Manager, who is responsible for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998/GDPR May 2018).

Giffards Primary School uses closed circuit television (CCTV) images to reduce criminal and other actions of individuals that have a negative impact on teaching, learning and the working environment and to monitor the school buildings to prevent the loss or damage to school property and its assets. The aim is to provide a safe and secure environment for pupils, staff and visitors.

	Date carried out	Comments
There is a named individual who is responsible for the operation of the system.		
A system had 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.		
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.		
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 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 C – Impact Assessment

A. This is an impact assessment statement for the use of surveillance CCTV at:

Giffards Primary School, Queen Elizabeth Drive, Corringham, Essex SS17 7TG

This assessment has been carried out by:

Sue Bryant..... (name)

SBM..... (position)

The assessment is effective from ...08 /05/ 2018... until review on

07/ 05 /2020

The data controlling officer for the school is:

...Mrs Nicky Haslam-Davis..... (name)

.Headteacher..... (position)

...01375 672138..... (telephone contact)

headteacher@giffardsprimary.thurrock.sch.uk..... (email contact)

Registration with the Office of the Information Commissioner last checked on

08/05/ 2018, registration is renewed yearly. Checks for serviceability of

CCTV systems and clarity of images last completed on 08/05 /2018....

B. Areas on the school site covered by installed surveillance CCTV, whether active or not.

CAMERA AREA	No. of cameras	Purpose of cameras in this area
Main reception and lobby through in KS2	2	Monitoring visitors in the school as well as security. Monitoring movement and behaviour in communal areas
Small office KS2	1	Monitoring the CCTV screen and recorder for security purposes as well as enabling meetings to be recorded if either staff member or visitor feels more secure having that recording.
Corridor outside ICT suite	1	For security reasons to prevent loss of property from the school: a large investment in ICT equipment has been made previously.
Bottom of stairs KS2	1	Monitoring movement and behaviour in communal areas

Top of stairs overlooking coat area at KS2		Monitoring movement and behaviour in communal areas
Resources room in annex		Monitoring movement and behaviour in communal areas

C. Impact assessment for use of CCTV

Advantages of use of CCTV over other possible methods:

Proof of who is entering/leaving the premises and to monitor vulnerable areas of the building to prevent loss/damage to school property and its assets. For the protection of staff.

Assessment of amount of equipment used and time equipment is active:

7 cameras recording 7 days per week, 24 hours per day

Specific ways in which data collected will be used, including restrictions:

Only will be used as evidence as necessary if there has been an incident that is under investigation.

For stored data, the method used the maximum length of time of storage, and how the data might be used:

Stored on hard disc, maximum storage time is 30 days. If not before the data is automatically overwritten.
Data may be used as evidence if there is a theft as well as to show behavior that has a negative impact on teaching, learning and the working environment.

All personnel having immediate access to data collected and stored, as part of specific duties:

SLT inc SBM will be the only personnel who could gain immediate access to the data

Details of how data may be processed, by whom and what purpose(s):

Data can be saved if necessary if there is an on-going investigation. It will be destroyed once investigation is complete.

Details of further personnel who may gain temporary access to data as part of their duties:

No other personnel

Methods of notification of the presence of surveillance CCTV and other information channels:

Via newsletter to parents as well as staff. CCTV policy on website. Signs around external of the building as well as when entering each area where a camera is sited.

Details of all method(s) by which images, or collected data, from CCTV may be streamed to any outside agency or other parties, if relevant. Restrictions on access are also included:

No streaming is carried out.