



Pound Hill Junior School

CCTV POLICY

September 2024

To be reviewed September 2025

**CCTV Feed from classrooms has been
suspended
17th October 2024**

Contents:

1. Purpose
2. Scope
3. Location of cameras
4. PE Changing and Other Similar Times
5. Changes to PE Sessions, Clubs and ad hoc Events
6. Supply Teachers and Non-School Staff
7. Temporary cameras
8. Storage and Retention of CCTV Images
9. Access to CCTV Images
10. Subject Access Requests
11. Access and Disclosure of Images to Third Parties
12. Responsibilities
13. Data Protection Assessments and Privacy by Design
14. Policy Review
15. Links with other policies

1. PURPOSE

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Pound Hill Junior School, hereafter referred to as 'the school'.

CCTV systems are installed (both internally and externally) in 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 and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the 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 as well as for monitoring student behaviour.
- preventing bullying.
- 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.

The system does not have sound recording capability.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.

The School's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at the main external entrance to the school site. The school will ensure that there are prominent signs placed around the building.

The system will give maximum effectiveness and efficiency within classrooms and around the school, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the School, 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 student attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. LOCATION OF CAMERAS

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as 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 the images captured comply with the legislation.

The school will make every effort to position the cameras so that their coverage is restricted to the school premises, which includes both indoor and outdoor areas.

CCTV is used in classrooms and in limited areas within the school that have been identified as not being easily monitored.

Members of staff will have access to details of where CCTV cameras are situated, apart from cameras placed for the purpose of covert monitoring.

4. PE CHANGING AND OTHER SIMILAR TIMES

At the start of every term, a timetable for PE and Games is created and agreed upon by all class teachers. The recording of CCTV images for each class is turned off during these sessions ensuring that there is adequate time for the changing into and out of PE kits. All staff are made aware of the times that the recording of the CCTV image is turned off and are instructed to ensure that all changing takes place within these times. This is recorded in the Staff Handbook.

5. CHANGES TO PE SESSIONS, CLUBS AND AD HOC EVENTS

Staff are not permitted to make changes to PE changing times, add clubs or ad hoc events without informing the Headteacher and Data Protection Officer (DPO) and requesting that the CCTV recording is turned off, stating start time, end time and any recurrence. All requests must be sent at least 2 working days prior to the requested change by email to head@poundhilljunior.org.uk AND DPO@poundhilljunior.org.uk. No changes to PE changing times, add clubs or ad hoc events can be made by any member of staff without email confirmation from the DPO.

6. SUPPLY TEACHERS AND NON-SCHOOL STAFF

All Supply Teachers, instructors, peripatetic teachers, wrap-around childcare staff and visitors must understand and follow the CCTV Policy.

Daily supply teachers are NOT permitted to undertake PE and Games lessons.

Longer term supply teachers (over 5 days) will receive a condensed version of the Staff Handbook which will inform them of the PE and Games expectations around changing.

Instructors for clubs or sessions within the school day must be under the supervision of a member of school staff

Peripatetic teachers will not be permitted to undertake any form of changing.

Instructors for clubs or sessions outside of the school day must understand and follow the CCTV Policy. Prior to the commencement of the club or session the school and the instructor will agree a location and time for changing. The DPO will ensure that the CCTV recording is turned off with sufficient time for changing into and out of PE kits.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- ***Protection of school buildings and property:*** The building's perimeter, main entrances, classrooms, shared use areas, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- ***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
- ***Video Patrol of Public Areas:*** Parking areas, Main entrance/exit gates, Traffic Control
- ***Criminal Investigations (carried out by the police):*** Robbery, burglary and theft surveillance

7. TEMPORARY CAMERAS

The school may use temporary cameras in exceptional circumstances without consulting the wider community. This includes situations where there is good cause to suspect illegal or serious unauthorized actions, or serious misconduct, and notifying individuals would prejudice the investigation.

Authorisation must be obtained from the Headteacher and Chair of Governors beforehand.

Temporary cameras may be used in classrooms but will not be used to observe or assess a teacher's professional performance or contribute to capability proceedings. They will not be placed in areas expected to be private, such as toilet cubicles, and will cease following the completion of the investigation.

8. STORAGE AND RETENTION OF CCTV IMAGES

The footage is not used to monitor the premises in real-time and, if necessary, reviewed post-event to investigate reported incidents or security breaches. The entrance camera is monitored live to enable school office staff to identify and grant access to visitors promptly. Live viewing of recordings for classrooms is avoided.

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than 31 days an electronic file held on a secure central server where specific CCTV image/recordings are retained will be kept. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the school's purposes for recording information, and how long it is needed to achieve this purpose.

The school will always store data securely.

9. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

10. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR. All requests should be made in writing to the Data Protection Officer who can be contacted by email to dpo@poundhilljunior.org.uk

Individuals submitting requests for access will be asked to provide sufficient detailed (not broad eg. "on Thursday 23rd") information to enable footage relating to them to be identified. For example: time, date and location.

The school

- does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.
- will respond to requests within 30 days of receiving the request but if a request is received outside of the school term this may not be possible.
- 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 or compromise an individual's personal or professional rights.

11. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the Data Protection Officer. 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.

12. RESPONSIBILITIES

The Headteacher and DPO will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school.
- Ensure that all existing CCTV systems are consistent with the highest standards and protections will be monitored and evaluated for compliance with this policy.
- 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 or the release of images or video or any material recorded or stored in the system.
- Ensure that monitoring recorded data are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Consider both students 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.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that data are stored in a secure place with access by authorised personnel
- Ensure that images recorded on digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- 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.

School Staff will:

- Read, understand and follow the CCTV Policy and procedures
- Support Supply Teachers, instructors, peripatetic teachers, wrap-around childcare staff and visitors must understand and follow the CCTV Policy.
- Ensure that PE and Games changing takes place within the set times
- Ensure that they do not make changes to these PE and Games times or add sessions without requesting the CCTV recording is turned off in line with school procedures
- Communicate with the Headteacher and DPO for any additions or changes to times at least 2 working days prior to the change and not action this change until they have received email confirmation.
- Inform the DPO if they suspect any privacy breach

Supply Teachers, instructors, peripatetic teachers, wrap-around childcare staff and visitors will:

- Read, understand and follow the appropriate sections of the CCTV Policy and procedures
- Liaise with the DPO to request that CCTV recording is turned off in line with school procedures where pupils are changing.
- Ensure that changing takes place within the agreed and set times
- Ensure that they do not make changes to session or add sessions without requesting the CCTV recording is turned off in line with school procedures
- Communicate with the Headteacher and DPO for any additions or changes to times at least 2 working days prior to the change and not action this change until they have received email confirmation.
- Inform the DPO if they suspect any privacy breach.

13. DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY BY DESIGN

CCTV has the potential to be privacy intrusive. The school will perform a Data Protection Impact Assessment when installing additional or moving existing CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

14. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

15. LINKS WITH OTHER POLICIES

This CCTV policy is linked to the school:

- Data Protection Policy
- Freedom of Information Policy
- Security Incident and Data Breach Policy
- Information Sharing Policy
- Safeguarding policy
- GDPR Privacy Notices

The ICO also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk

APPENDIX A

CCTV SIGNAGE

It is a requirement of the Data Protection Act 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 purposes of using CCTV.
- The name of the school.
- The contact telephone number or address for enquiries.

Example Sign



WARNING

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 the School and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police.

This scheme is controlled by the School

For more information contact<phone number>.....