



St Barnabas CE Primary School

*Preparing for a positive future,
achieved through faith*

Policy:	CCTV Policy
Date written:	November 2021
Date reviewed and agreed by Governors:	November 2021
Date of next review:	November 2024

CCTV POLICY

1 Policy Statement

- 1.1 St Barnabas CE Primary School uses Close Circuit Television ("CCTV") within the premises of the School. The purpose of this policy is to set out the position of the School as to the management, operation and use of the CCTV at the School.
- 1.2 This policy applies to all members of our Workforce, visitors to the School premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance, including:
- 1.3.1 General Data Protection Regulation ("GDPR")
 - 1.3.2 *[Data Protection Act 2018]* (together the Data Protection Legislation)
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner
 - 1.3.4 Human Rights Act 1998
- 1.4 This policy sets out the position of the School in relation to its use of CCTV.

2 Purpose of CCTV

- 2.1 The School uses CCTV for the following purposes:
- 2.1.1 To provide a safe and secure environment for pupils, staff and visitors
 - 2.1.2 To prevent the loss of or damage to the School buildings and/or assets
 - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

3 Description of system

13 x Hikvision DS-2CE16D5T-VFIT3 Bullet Cameras - also have in-built LEDs to enhance the picture reception during hours of darkness

Key Features:

- HD Quality 1080P
- True Day/Night
- Varifocal Lens
- Smart IR
- 50m IR Distance
- Ultra-Low Illumination

13 x Hikvision DS-1280ZJ-S IP Junction Boxes

2	x	Hikvision DS-2CE56D5T-VFIT3 Dome Cameras - also have in-built LEDs to enhance the picture reception during hours of darkness
		Key Features: <ul style="list-style-type: none"> • HD Quality 1080P • True Day/Night • Varifocal Lens • Smart IR • 50m IR Distance • Ultra-Low Illumination
1	x	E2280HS 22" LED Monitor
1	x	Hikvision DS-7316-HQHI-SH 16-Channel DVR
		Key Features: <ul style="list-style-type: none"> • 16-Channel • H.264 Video Compression • Real Time Recording • HDMI Output • Remote Viewing • 8TB Hard Drive
2	x	SEA4000VX000 4TB Hard Drives
4	x	HAY-PSU412-5A 12v 5a Power Supply Units

All CCTV cameras are fixed and do not record sound.

4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.
- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The School will make all reasonable efforts to ensure that areas outside of the School premises are not recorded.
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4 Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

5 Privacy Impact Assessment

- 5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by the School to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 The School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

- 6.1 The CCTV system will be managed by the Office Manager.
- 6.2 On a day to day basis the CCTV system will be operated by the ICT technician.
- 6.3 The viewing of live CCTV images will be restricted to SLT.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by SLT.
- 6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.6 The CCTV system is checked weekly by the ICT technician, to ensure that it is operating effectively

7 Storage and Retention of Images

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 7.2 Recorded images are stored only for a period of 28 days unless there is a specific purpose for which they are retained for a longer period.
- 7.3 The School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1 CCTV recording systems being located in restricted access areas;
 - 7.3.2 The CCTV system being encrypted/password protected;
 - 7.3.3 Restriction of the ability to make copies to specified members of staff
- 7.4 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.

8 Disclosure of Images to Data Subjects

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the School's Subject Access Request Policy.

- 8.3 When such a request is made a member of SLT will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The SLT member must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5 If the footage contains images of other individuals then the School must consider whether:
 - 8.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - 8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - 8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 8.6 A record must be kept, and held securely, of all disclosures which sets out:
 - 8.6.1 When the request was made;
 - 8.6.2 The process followed by the authorised member of SLT in determining whether the images contained third parties;
 - 8.6.3 The considerations as to whether to allow access to those images;
 - 8.6.4 The individuals that were permitted to view the images and when; and
 - 8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

Please note that when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. We have referred only to "access" as opposed to a "permanent copy" as School may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.

- 9.1 The School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then SLT must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- 9.4 The information above must be recorded in relation to any disclosure.
- 9.5 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.

10 Review of Policy and CCTV System

- 10.1 This policy will be reviewed ANNUALLY.
- 10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed ANNUALLY.

The privacy impact assessment (PIA) relating to the system should be reviewed regularly to ensure that the use of any CCTV system continues to be justified and is compliant with legal requirements. The School should ensure that it has procedures in place to ensure that the CCTV system is regularly reviewed.

11 Misuse of CCTV systems

- 11.1 The misuse of CCTV system could constitute a criminal offence.
- 11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

- 12.1 Any complaints relating to this policy or to the CCTV system operated by the School should be made in accordance with the School Complaints Policy.

St Barnabas CE Primary School CCTV PRIVACY IMPACT ASSESSMENT

1 Who will be captured on CCTV?

Pupils, staff, parents / carers, volunteers, Governors and other visitors including members of the public etc

2 What personal data will be processed?

Facial Images, behaviour, sound

3 What are the purposes for operating the CCTV system? Set out the problem that the [Trust/Academy/School] is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

To provide a safe and secure environment for pupils, staff and visitors

To prevent the loss of or damage to the School buildings and/or assets

Prevention or detection of crime.

CCTV is the best solution because the school is unable to ensure surveillance of the school premises out of hours by any other means - the school budget does not have the capacity to employ a member of staff to undertake this role.

4 What is the lawful basis for operating the CCTV system?

Legal Obligation, legitimate interests of the school to maintain health and safety and to prevent and investigate crime

5 Who is/are the named person(s) responsible for the operation of the system?

The headteacher - Miss J Hodgkinson

6 Describe the CCTV system, including:

- a. Elite Hikvision system has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. Cameras are located at regular intervals on the outside of the building to enable vision around the school grounds for the purposes of health and safety and security.
- c. cameras have been sited on the edge of the building, to avoid capturing images which are not necessary for the purposes of the CCTV system; the cameras will therefore only capture images from the exterior of the building
- d. signs notifying individuals that CCTV is in operation are located at all entrance/axit points to the school grounds, stating the purpose that CCTV is in operation
- e. the system enables third party data to be redacted, for example via blurring of details of third party individuals.

7 Set out the details of any sharing with third parties, including processors

Police, subject access requests

The School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then SLT must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

8 Set out the retention period of any recordings, including why those periods have been chosen

Recorded images are stored only for a period of 28 DAYS unless there is a specific purpose for which they are retained for a longer period.

- 9 Set out the security measures in place to ensure that recordings are captured and stored securely

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors. Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The School will make all reasonable efforts to ensure that areas outside of the School premises are not recorded. Signs will be erected to inform individuals that they are in an area within which CCTV is in operation. Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

The School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
CCTV recording systems being located in restricted access areas;
The CCTV system being encrypted/password protected;
Restriction of the ability to make copies to specified members of staff

- 10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- **Is it fair to record them in the way proposed?**
 - *To provide a safe and secure environment for pupils, staff and visitors*
 - *To prevent the loss of or damage to the School buildings and/or assets*
 - *Prevention or detection of crime.*
 - *Clear signage stating that CCTV is in operation*
- **How is the amount of data processed to be minimised?**
 - *Accessed only by authorised member of SLT*
 - *Stored for 28 days, unless for a specific purpose*
- **What are the risks of the system being accessed unlawfully?**
 - *Very low - system is password protected and can only be accessed by authorised technician for maintenance and authorised member of SLT*
- **What are the potential data breach risks?**
 - *Unauthorised access to system*

- What are the risks during any transfer of recordings, or when disclosed to third parties such as the police?
- *Loss of device by third party*

11 What measures are in place to address the risks identified?

- System is password protected and can only be accessed via the computer in the main office which is also password protected.
- Recordings will only be transferred to encrypted devices by authorised members of SLT.

12 Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

Parents and pupils were informed when CCTV was installed and given the opportunity to share their views. Clear signage around the premises informs all visitors that CCTV is in operation. Parents/pupils/visitors have the opportunity to share their views via the appropriate channels.

13 When will this privacy impact assessment be reviewed?

September 2022

Approval:

This assessment was approved by the Data Protection Officer:

DPO

Date

