

POLICY DOCUMENT

002: CCTV

Access: Unrestricted

Publish to: All Staff / All Pupils and School Website

Status: Non-statutory

Approval level: Finance & Resource Committee

Review Responsibility	Valid from	Review date	Frequency of review	Signed off by
School Business Manager	30-06-2022	30-05-2024	2 Years	FR Committee 05-07-2022
School Business Manager	28-06-2024	28-05-2026	2 Years	FR Committee 02-07-2024
School Business Manager	28-06-2026	28-05-2028	2 Years	FR Committee 21-05-2026

Introduction

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

Statement of Intent

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms)
- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

Locations of Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed 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. The school will make every effort to position cameras so that their coverage is restricted to the external school premises. CCTV are installed for external use only and will not be used in classrooms. Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

Covert Monitoring

The school may in exceptional circumstances set up covert monitoring. For example:

- 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
- 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. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets

Storage and Retention of CCTV images

Recorded data is retained for approximately 30 days. 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. All retained data will be stored securely. Access to CCTV images or access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to them under the Data Protection Act. 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.

The school will respond to requests within 30 days of receiving the written request and fee.

A fee of £100 may be charged per request at the school's discretion. 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.

Access to and Disclosure of Images to Third Parties

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). Requests should be made in writing to the Headteacher.

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.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance. This policy will be reviewed and approved by the Finance Committee every two years, or earlier where there is a change in the applicable law affecting this Policy Guidance.

Further Information

Further Information on CCTV and its use:

- CCTV Code of Practice (published by the Information Commissioners Office) <https://ico.org.uk/>
- Regulation of Investigatory Powers Act (RIPA) 2000
- General Data Protection Regulation (GDPR) and the Data Protection Act 2018