

# **CCTV Policy**

## **(Code of Practice)**



**EXCEEDING EXPECTATIONS**

**This policy will be reviewed December 2020**

## 1 Policy Statement

1.1 Warwick Road 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 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 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

## 3 Description of system

3.1 The system comprises of a number of fixed and dome cameras.

3.2 The system does not have any sound recording capability.

## 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 and grounds are not recorded.

4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

## 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 led by a member of the Senior Leadership Team with appropriate seniority.

6.2 Any allegations against staff will be referred immediately to the Headteacher and only they will determine who needs to view the footage.

6.3 On a day to day basis the CCTV system will be operated by an individual with appropriate technical ability. This maybe a member of the School Office Team or during non-term time the Caretaker.

6.4 The viewing of live CCTV images will be restricted to the Senior Leadership Team (with assistant from the School Office Team) who will ensure that in doing so, the purposes in 2.1 are satisfied.

6.5 Recorded images which are stored by the CCTV system will be restricted to access by members of the Senior Leadership Team as in 6.4.

6.6 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.

## 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 14 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 password protected and access only permitted to SLT and the School Office Team;

7.3.3 Restriction of the ability to make copies to specified members of staff

7.3.4 Restriction of repositioning CCTV cameras to SLT only.

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 Data Protection Policy and a subject

access request form needs to be completed. Individuals submitting requests will be asked to provide sufficient information to enable the footage relating to them to be identified. For example date, time and location.

8.3 When such a request is made the Headteacher/Business Manager 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 Headteacher/Business Manager 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 person accessing the CCTV 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.

## 9 Disclosure of Images to Third Parties

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, insurance companies and their legal representatives 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, insurance companies and their legal representatives for disclosure of CCTV images then the Headteacher/Business Manager must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency, insurance companies and their legal representatives 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.

9.6 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.

## 10 Review of Policy and CCTV System

10.1 This policy will be reviewed bi-annually or earlier should the need arise.

## 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.



## SUBJECT ACCESS REQUEST FORM Application for CCTV Data

You should complete this form to gain access to CCTV data. You are currently entitled to receive this information under the Data Protection Act 2018 (DPA) and under the EU General Data Protection Regulation (GDPR).

The information you supply in this form will only be used for the purpose of identifying the personal data you are requesting and responding to you. You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your application quickly. All requests must contain this information.

Please be aware if the request is made during the summer break, staff won't be able to deal with your request until the new term begins.

### Section 1: Details of the person requesting information

Full name	
Address	
Contact telephone number:	
Email address:	

### Section 2: Are you the data subject?

YES: I am the data subject. I enclose proof of my identity

To ensure we are releasing data to the right person we may require you to provide us with proof of your identity and of your address. Please supply us with a photocopy or scanned image (do not send the originals) of one or both of the following:

Proof of identity - Passport, photo driving licence, national identity card or birth certificate.

Proof of Address - Utility bill, bank statement, credit card statement (no more than 3 months old); current driving license; current TV license; local authority tax bill, HMRC tax document (no more than 1 year old).

If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

**SECTION 3: Details of the data subject**

The location of the CCTV camera	
The date and time the images were recorded	
Please provide any relevant details you think will help us to identify the information you require.  (ie description, car registration, model etc)	

Disclosures of images to third parties:-

- The school will only disclose recorded CCTV images where it is permitted to do so in accordance with the Data Protection Legislation.
- CCTV images will only be disclosed to law enforcement agencies, insurance companies and their legal representatives in line with the purpose for which the CCTV system is in place.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application. I understand that it is necessary for Warwick Road Primary School to confirm my identity and it may be necessary to obtain more detailed information in order to locate the correct data.

**Signed:** ..... **Date:**.....

Please return the completed form to:

Warwick Road Primary School  
Warwick Road Batley WF17 6BS  
Email: [office.warwickroad@kirkleeseducation.uk](mailto:office.warwickroad@kirkleeseducation.uk)  
Telephone: 01924 455593