



## Harrow Lodge Primary School

### CCTV POLICY

#### 1 Policy Statement

- 1.1 Partnership Learning and Its Schools use Close Circuit Television (“CCTV”) within the premises of Partnership Learning and Its Schools. The purpose of this policy is to set out the position of Partnership Learning and Its Schools as to the management, operation and use of the CCTV at Partnership Learning and Its Schools
- 1.2 This policy applies to all members of our Workforce, visitors to Partnership Learning and Its Schools 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*
  - 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 Partnership Learning and Its Schools in relation to its use of CCTV.

#### 2 Purpose of CCTV

- 2.1 Partnership Learning and Its Schools 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 Partnership Learning and Its Schools 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**

- 3.1 There are 9 cameras, none with sound facility, recording 24hrs a day. They are controlled by motion sensors. They detect all areas externally to the school.

### **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. Partnership Learning and Its Schools will make all reasonable efforts to ensure that areas outside of Partnership Learning and Its Schools 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 Partnership Learning and Its Schools to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 Partnership Learning and Its Schools 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 Site Manager under the direction of the Office Manager
- On a day to day basis the CCTV system will be operated by the Site Manager
- The viewing of live CCTV images will be restricted to the Site Team and the members of SLT
- 6.2 Recorded images which are stored by the CCTV system will be restricted to access by the Site Team and SLT.
- 6.3 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.
- 6.4 The CCTV system is checked daily by The Site Manager 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 Partnership Learning and Its Schools 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 Partnership Learning and Its Schools.

## **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 Partnership Learning and Its Schools Subject Access Request Policy.
- 8.3 When such a request is made the Site Manager/Headteacher 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 Site Manager/Headteacher 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 Partnership Learning and Its Schools 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 Site Manager/Headteacher 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 Partnership Learning and Its Schools 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 The Site Manager/Headteacher 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

**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 Partnership Learning and Its Schools should be made in accordance with Partnership Learning and Its Schools Complaints Policy.

## 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.

2 What personal data will be processed?

Facial Images and behaviour

3 What are the purposes for operating the CCTV system? Set out the problem that Partnership Learning and Its Schools are seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

- Prevention or detection of crime
- To ensure the safety of the children through the identification of risks.

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

- Legal Obligation
- Legitimate interests of the organisation to maintain health and safety
- To prevent and investigate crime

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

David Welch

6 Describe the CCTV system, including:

- a. The CCTV system produces clear images in colour, which monitor 9 locations around the school. The central monitor captures all 9 locations at the same time, but the other monitor in the main office shows only one location at a time.
- b. The 9 cameras are sited to ensure all external areas around the school are monitored to identify and record safety and security issues.
- c. The cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;

- d. There are signs notifying individuals that CCTV is in operation and these are located in areas around the school where they are visible to all visitors, staff, parents and children; and
- e. The system does not 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

Harrow Lodge Primary contract Secom to managed and service our CCTV system on site. They are able to view the recordings but do not take any off site. In the interests of crime detection we will allow access to recordings from the police and to subject access requests where the subject is recorded within the system. The data will be kept securely within school.

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

28 days

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

Controller is locked cupboard and only key staff have access.

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

- Individuals will be identified by their image and may get caught up in footage needed for crime prevention and detection purposes.

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

- Recordings are only kept for 28 days
- Recordings are stored in a locked cupboard
- Only Site Manager and SLT can view the images

- 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 have been informed through newsletters that the CCTV is used to help ensure the safety and security of the pupils, parents, staff and visitors.
- Signage is visible that informs that the site is monitored by CCTV.

- 13 When will this privacy impact assessment be reviewed?

Annually

**Approval:**

This assessment was approved by the school's Data Protection Lead and Partnership Learning's Data Protection Officer:

School DPL Name:

Signature:

Date:

Partnership Learning DPO Name:

Signature:

Date: