



# CCTV Policy

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### 1. Introduction

The main legislation in this area is the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 ("Data Protection Act")

### 2. Policy Aims

The purpose of this policy is to regulate the management and operation of the

Closed Circuit Television (CCTV) System at Princes Risborough School (the School). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is owned, administered and managed by the School, who act as the Data Controller. This policy is reviewed regularly and should be read with reference to the School's Data Protection & Privacy Policy (available on our website). We conduct an annual audit and review of our use of CCTV using the checklist in Appendix 2 of the ICO's CCTV Code of Practice:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests, or otherwise in the public interest. Data captured for the purposes below will not be used for any commercial purpose.

### **3. Objectives of the System**

To protect the personal safety of pupils, staff, volunteers, visitors and members of the public.

To protect the School buildings and equipment, and personal property of pupils, staff, volunteers, visitors and members of the public.

To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.

To ensure the security and integrity of the School site and deliveries and arrivals.

To uphold discipline among pupils in line with the Behaviour for Learning Policy, which is available to parents and pupils on request.

### **4. Positioning**

Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.

Adequate signage has been placed in prominent positions to inform all persons that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

No images of public spaces will be captured except to a limited extent at site entrances.

CCTV is not sited in classrooms and will not be used in such, except in exceptional circumstances and where justified in accordance with the Data Protection

Act/GDPR.

All data subjects, on request can access details of CCTV camera locations.

We have up to 64 CCTV cameras. The cameras do not record sound. Our main monitor is located in the Server Room. The school will always ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act/GDPR requirements.

## **5. Operation and Maintenance**

The CCTV System will be operational 24 hours a day, every day of the year.

The System Manager (defined below) will check and confirm that the System is recording and that cameras are functioning correctly, on a regular basis.

The System will be checked and (to the extent necessary) serviced regularly.

## **6. Supervision of the System**

The System Manager is trained in operating, recording and retaining images taken. The System Manager is aware of the procedure for handling requests for the disclosure of an image by individuals, where the school's procedure is set out in our data protection policy. If in doubt, the Data Protection Officer would be consulted.

Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **7. Storage of Data**

The day-to-day management of images will be the responsibility of the Site Manager, who acts as the System Manager, or such suitable person as the Headteacher shall appoint in his/her absence.

Images will be stored for 30 days and automatically over-written unless the School considers it necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

Where such data is retained, it will be retained in accordance with the Data Protection Act/GDPR and our Data Protection Policy.

The Data Protection Act/GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Rather, retention should reflect the organisation's purposes for recording information, which should be informed by the purpose for which the information is collected, and how long it is needed to achieve this purpose. Storage availability is also a factor to be considered in the ability to retain recordings.

## **8. Access to Images & Subject Access Requests**

Access to stored CCTV images will only be given to authorised persons pursuant to

paragraph 8.2 below, accompanied by another authorised person, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). No unauthorised person may access the CCTV system without the System Manager or head teacher being present. All request to view images must be authorised by the Headteacher or those authorised in his/her absence.

Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy & Privacy Notice on our website), including information held on the System, if it is still retained by the School at the time the request is received. The School will require specific details including at least to time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

All requests should be made in writing to the Headteacher or their representative.

The following staff have access to the CCTV:

- Site Manager
- Headteacher
- Deputy Headteachers
- Designated Safeguarding Lead & Deputy DSL
- Assistant Headteachers
- Any staff member specially designated by the Headteacher for a specific purpose

## **9. Disclosure of Images to Data Subjects (Subject Access Requests)**

Any Individual recorded and identifiable in any CCTV image is a data subject for the purposes of the Data Protection Act/GDPR and has the right to request access to those images.

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 Data Protection Policy.

All requests should be made in writing to the Headteacher or their representative. 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.

When such a request is made, the System Manager will review the CCTV footage, in accordance with the request.

With the permission of the Headteacher, 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 System Manager must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the Headteacher must

consider whether 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;

The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained;

If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

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 whether internally or by a third party.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made
- The process followed by the IT team (as the CCTV system administrators) in determining whether the images contained third parties
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when
- Whether a copy of the images was provided, and if so to whom, when and in what format.

## **10. Disclosure of Images to Third Parties**

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

Third parties acting behalf of a subject will be handled in accordance with the School's Data Protection Policy.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place and where justified in accordance with the Data Protection Act/GDPR.

If a request is received from a law enforcement agency for disclosure of CCTV images then the 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 may be disclosed, and the potential disclosure of any third party images.

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.

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.

## **11. Complaints and Queries**

Any complaints should be made via the process outlined in the School's complaints

Policy, available on the school website.

Any queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to Princes Risborough School, Merton Road, Princes Risborough, Buckinghamshire, HP27 9SY. Telephone: 01844 345496– Email: [office@prsbucks.com](mailto:office@prsbucks.com)

**12. Other Policies**

This should be read in conjunction with our Data Protection Policy and Privacy Notice.

**13. Version Control**

Date	Circulation	Amendments to previous version