
CCTV POLICY

Document Summary

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FYI: Version control should be used for all formal documents and managed as:-

- ▶ 0.1 (1st draft version)
- ▶ 0.2 (2nd draft and so on..... 0.3. 0.4 etc)
- ▶ 1.0 (Once document has been approved)
- ▶ 1.2 (during review/approval of a lifecycle document i.e. policies) ▶ 2.0 (2nd approved document) and so on.

Amendment History

Version	Amendment Date	Author	Amendment Summary
V0.0	16/12/18	MJ/LG	Policy Creation
V0.1	05/04/19	RO	Re-adding the £10 fee

V1.0	05/04/19	RO	Final formatting after approval
V1.1	01/07/21	LG	Review
V1.2	27/12/23	DF	Move to model policy
V2.0	28/02/24	RO	Final formatting after governor approval

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices		Date	03.02.24
EIA CARRIED OUT BY:	Debbie Fisher	EIA APPROVED BY:	Nicola Addicott

Groups that may be affected:

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		
Gender Reassignment (transsexual)		
Marriage and civil partnership		
Pregnancy and maternity		
Racial Groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers)		

Religion or belief (practices of worship, religious or cultural observance, including non-belief)		
Gender (male, female)		
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		

Any adverse impacts are explored in a Full Impact Assessment.

Table of Contents

1. Policy Statement	3
2. Purpose of CCTV	4
3. Description of System	4
4. Siting of Cameras.....	4
5. Data Protection Impact Assessment	5
6. Management and Access.....	5
7. Storage and Retention of Images	5
8. Disclosure of Images to Data Subjects	5
9. Disclosure of Images to Third Parties	6
10. Review of CCTV System.....	7
11. Misuse of CCTV Systems	7
12. Complaints Relating to this Policy.....	7

1. Policy Statement

1.1 Frampton Cotterell Church of England 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 the workforce, students, contractors, visitors to 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:

The General Data Protection Regulation (UK GDPR).

- Data Protection Act 2018
- The Freedom of Information Act 2000
- The Protection of Freedoms Act 2012
- Surveillance Camera Code of Practice produced by the Information Commissioner.
 - Human Rights Act 1998.
- Home Office (2013) 'The Surveillance Camera Code of Practice'
- Information Commissioner's Office (ICO) (2014) 'CCTV Code of Practice'

2. Purpose of CCTV

2.1 The school uses CCTV for the following purposes:

- To provide a safe and secure environment for learners, staff and visitors
- To prevent the loss of or damage to the school buildings and/or assets □ To support the Police in a bid to deter and detect crime;

3. Description of System

3.1 The system on the school site comprises a number of fixed dome cameras.

3.2 The system does not have sound recording capability.

3.3 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

3.4 The CCTV is monitored centrally from the school office by the Admin team and Head Teacher.

3.5 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.

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, learners 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 are 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.

5. Data Protection Impact Assessment

5.1 Prior to the installation of any CCTV camera, or system, a Data Protection Impact Assessment shall 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 policy and procedures will be managed at school level by the school's leadership team.

6.2 On a day to day basis the CCTV system will be operated by authorised staff in schools with delegated authority as appropriate.

6.3 The viewing of recorded CCTV images will be restricted to authorised members of staff in schools with explicit powers to view images, for the reasons set out above.

6.4 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. [see section 8]

6.5 The CCTV system is checked regularly by appropriate staff members in schools 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 will be retained for a maximum of 100 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

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:

- 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;
 - 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 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, provided always that such an image/recording exists.

i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable.

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 Data Protection Policy and with regard to the age of consent of a learner.

8.3 When such a request is made the Headteacher or their appropriately nominated representative 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 and with regard to the age of consent with a learner. The Headteacher or their representative 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:

- 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; or
- 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:

- when the request was made;
- the process followed by the school Site Manager 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; and
- 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 where it is permitted to do so in accordance with the Data Protection Legislation. Requests should be made in writing to the school office or via email (office@fcee.primary.co.uk) for the attention of the Headteacher in the first instance.

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, 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 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 school will have due regard to the Data Protection Act 2018, the General Data Protection Regulation (UK GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, the Trust will also have due regard to the Surveillance Camera Code of Practice (2013), issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.

10. Review of CCTV System

10.1 The CCTV system and the privacy impact assessment relating to it will be reviewed bi-annually.

11. Misuse of CCTV Systems

11.1 The misuse of CCTV systems 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 school's Complaints Policy