School CCTV Policy & Privacy impact Assessment

WATERGATE SCHOOL

'I Can, You Can, Together We Will'

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Watergate CCTV Policy

1 Policy Statement

1.1 Watergate 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 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* 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 of 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 law enforcement agencies in apprehending offenders

3 Description of system

3.1 The system installed is a Hikvision Hybrid consisting of 16 Terabytes of storage and has a capacity for 32 Analogue/HD cameras and a further 32 IP network cameras. The current connected cameras consist of 32 Analogue/HD and 3 IP network. All cameras are fixed and although the IP cameras have the facility for recording sound this feature has been disabled.

3.2 **Siting of Cameras**

All CCTV cameras are sited in such a way as to meet the purpose for which the CCTV is operated. Cameras are sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras are not 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.

Signs are erected around the school to inform individuals that they are in an area within which CCTV is in operation.

Cameras are not sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

4 Privacy Impact Assessment

4.1 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.

4.2 The School adopts 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.

5 Management and Access

5.1 The CCTV system is managed by the Business Manager who is responsible to the Headteacher.

5.2 On a day to day basis the CCTV system will be operated by Deku Solutions Limited.

5.3 The viewing of live CCTV images will be restricted to Business Manager and the Senior Leadership Team.

5.4 Recorded images which are stored by the CCTV system will be restricted to access by Business Manager and the Senior Leadership Team.

5.5 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.

5.6 The CCTV system is checked WEEKLY by the Premises Manager to ensure that it is operating effectively

6 Storage and Retention of Images

6.1 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.

6.2 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.

6.3 The School ensures that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

6.3.1 CCTV recording systems being located in restricted access areas;

6.3.2 The CCTV system being encrypted/password protected;

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

6.4 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

7 Disclosure of Images to Data Subjects

7.1 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.

7.2 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 Subject Access Request Policy.

7.3 When such a request is made a member of the Senior Leadership Team will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

7.4 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. A member of the Senior Leadership Team must take appropriate measures to ensure that the footage is restricted in this way.

7.5 If the footage contains images of other individuals then the School must consider whether:

7.5.1 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;

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

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

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

7.6.1 When the request was made;

7.6.2 The process followed by a member of the Senior Leadership Team in determining whether the images contained third parties;

7.6.3 The considerations as to whether to allow access to those images;

7.6.4 The individuals that were permitted to view the images and when; and

7.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

Disclosure of Images to Third Parties

7.7 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.

7.8 The School will disclose any CCTV images, where there have been safeguarding concerns, at Disciplinary Hearings as evidence.

7.9 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

7.10 If a request is received form a law enforcement agency for disclosure of CCTV images then a member of the Senior Leadership Team 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.

7.11 The information above must be recorded in relation to any disclosure.

7.12 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.

8 Review of Policy and CCTV System

8.1 This policy will be reviewed annually.

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

9 Misuse of CCTV systems

9.1 The misuse of CCTV system could constitute a criminal offence.

9.2 Any member of staff who breaches this policy may be subject to disciplinary action.

10 Complaints relating to this policy

10.1 Any complaints relating to this policy or to the CCTV system operated by the School should be made in accordance with the School's Complaints Policy.