

CCTV Policy

April 2019



THE JO RICHARDSON

SUCCESS FOR ALL

COMMUNITY SCHOOL

ACHIEVE

Introduction

The school recognises that CCTV systems (closed circuit television) can be privacy intrusive. Review of this policy shall be undertaken regularly and, whenever new equipment is introduced, a review will be conducted and a risk assessment put in place. We aim to conduct reviews every two years.

Purpose

The purpose of this policy is to regulate the management, operation and use of the CCTV system, both internally and externally of the Jo Richardson Community School (JRCS) premises.

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at JRCS is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidents of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

Justification for use of CCTV

The General Data Protection Regulation (GDPR) requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that JRCS needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the school Governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal staff/student classroom activity in school and does not have sound recording capability.

In other areas of the school where CCTV has been installed, eg, corridors, stairwells and locker areas, the Headteacher has demonstrated that there is a proven risk to security and/or health and safety and that the installation of CCTV is proportionate in addressing such issues.

Notification signage

Adequate signage will be placed at each entrance to indicate that CCTV is in operation on JRCS premises.



Location of cameras

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. JRCS has endeavoured to select locations for the installation of CCTV cameras which are least intrusive in order to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV video monitoring and recording of public areas by JRCS may include the following:

- Protection of school buildings and property: the building's perimeter, entrances and exits, lobbies and corridors, special storage areas, receiving areas for goods/services;

- Monitoring of access control systems: monitor and record restricted access areas at entrances to buildings and other areas;
- Video patrol of public areas: parking areas, main entrance/exit gates, traffic control.

A full list of camera locations can be obtained from the ICT Network and Systems Manager.

Storage and retention

The GDPR states that data "shall not be kept for longer than is necessary for the purposes for which it was obtained". A Data Controller needs to be able to justify this retention period. We retain images captured by the CCTV system for 42 days which is an average school half-term. However, they could be retained for longer where the images identify an issue, such as a break-in or theft, and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment. Access will be restricted to authorised personnel agreed by the Headteacher.

Maintenance

The CCTV system is installed and maintained by Access and Lock Ltd.

JRCS ICT Support team will check the cameras weekly to ensure they are working and log any faults to the onsite facilities team (Bouygues) who will then liaise with Access and Lock Ltd.

Access

CCTV footage will be saved on a DVR unit using hard drives. This will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

Access to the CCTV system and stored images will be restricted to authorised personnel only. The ability to backup and export footage can only be carried out by JRCS ICT Support team.

In relevant circumstances, CCTV footage may be accessed/provided:

- Where JRCS are required by law to make a report regarding the commission of a suspected crime;
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on JRCS property;
- To the Health and Safety Executive (HSE) and/or any other statutory body charged with child safeguarding;
- To assist the Headteacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed;
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to JRCS;
- To individuals (or their legal representatives) subject to a court order;
- To the school's insurance company where they require it to pursue a claim for damage done to the insured property.

Request for access by a data subject

On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists, ie, 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.

To exercise their right of access, a data subject must make an application either in writing to the School Office (marked Subject Access Request) or by email to gdpr@jorichardson.org.uk. The school will aim to respond to such request within 30 days. Please note we will not be checking emails during the summer holidays and all requests will be responded to when the school reopens. Therefore, please allow 30/60 days to respond from the first day of the autumn term.

When making a Subject Access Request, please provide all the necessary information to assist JRCS in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the school.

In giving a person a copy of their data, the school may provide a still picture or series of still pictures or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

Complaints about the use of CCTV

Any complaints in relation to the school's CCTV system should be addressed to the Head of School.

Public information

Upon request to the School Office, a copy of this policy will be made available to the public.