

GROVE WOOD PRIMARY SCHOOL



CCTV Policy

Date of Policy: March 2025

Date ratified by the Governing Body: 25th March 2025

| CCTV Policy | | |
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| Version | Date | Description of change |
| 1 | May 2018 | New procedure |
| 2 | March 2022 | Review of policy: <ul style="list-style-type: none"> • Section 2: 4 new paragraphs inserted • Section 3: renamed • Section 5: additional wording around retention periods • Section 7: additional wording added regarding timescales and access to footage • Section 9 added regarding Data Protection Impact Assessments and Privacy by Design • Appendix A: example of signs added |
| 3 | September 2024 | Review of policy: <ul style="list-style-type: none"> • Section 1: wording changed to Data Protection Act • Section 2: Updated link to ICO guidance |
| 4 | March 2025 | Policy re-written. <ul style="list-style-type: none"> • Objectives of the scheme expanded • Section expanded on third party requests for footage • Section expanded on exemptions for CCTV access, as part of a Subject Access Request |

Index

| | |
|---|---|
| 1. Introduction | 4 |
| 2. Objectives of the CCTV scheme | 4 |
| 3. Statement of Intent | 4 |
| 4. Operation of the system | 5 |
| 5. Checking of the system | 5 |
| 6. Monitoring procedures..... | 5 |
| 7. Storage and Retention of CCTV Images / Recording procedures..... | 5 |
| 8. Breaches of the code | 6 |
| 9. CCTV Access and GDPR Compliance Statement..... | 6 |
| 10. Data Protection Impact Assessments and Privacy by Design | 7 |
| 11. Complaints | 7 |
| 12. Further information | 7 |
| Appendix A – CCTV signage | 8 |
| Appendix B – CCTV viewing of Incident Recording..... | 9 |

1. Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Grove Wood Primary School, hereafter referred to as 'the school'. The system comprises a number of fixed and dome cameras located around the school site internally and externally. The CCTV recording system runs 24/7. Monitors located in the administrative offices and the Site Manager's office afford real time viewing of events around the school. The Site Manager's office monitor, in conjunction with the video recorder acts as the Control Monitor for the system and provides the following viewing facilities:

- Manual switching between cameras
- Single screen simultaneous viewing of all cameras
- Spot monitoring by designated camera

The school's CCTV system is operated within the guidelines of the Data Protection Act. The CCTV system is owned and operated by the school.

2. Objectives of the CCTV scheme

The objectives of the school's CCTV scheme are:

- To increase personal safety of pupils, staff, parents and visitors when entering, moving around and leaving school
- To enable the office to see the main school gates when open
- To protect the school building and assets
- To assist in managing the school
- To reduce the fear of crime
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders

3. Statement of Intent

The school will:

- Comply with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that it is used responsibly and safeguards both trust and confidence in its continued use
- Treat the system and all information, documents and recordings obtained and used, as data, (Recognisable images captured by CCTV systems are 'personal data'), which is protected by the Data Protection Act.
- Use the CCTV system to monitor activities within the school site and its car park to secure the safety and wellbeing of pupils, staff, parent and visitors
- Use the CCTV system to identify criminal activity actually occurring – anticipated or perceived
- Ensure that materials or knowledge secured as a result of CCTV will not be used for any commercial purposes

- Recordings will only be released to the media for use in the investigation of a specific crime and only with the authority of the Police
- While the CCTV scheme is designed to provide maximum effectiveness and efficiency, it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage
- CCTV warning signs are clearly and prominently placed at access routes to areas covered by the school CCTV. Signs contain details of the purpose for using CCTV (See Appendix A).

4. Operation of the system

The CCTV scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code. The CCTV system will operate 24 hours each day, every day of the year. It does not have sound recording capability

5. Checking of the system

The Site Manager will check the functioning of the system on a regular basis and in particular, that the equipment is properly recording and that cameras are operating. Access to the CCTV recording and playback facilities is strictly limited to the Headteacher or persons designated by him, to undertake this responsibility on their behalf. Only personnel employed by the school's appointed CCTV maintenance contractor may undertake routine maintenance or repairs to the system.

6. Monitoring procedures

Camera surveillance will be maintained at all times.

Covert Monitoring

The school may, in exceptional circumstances, set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s) is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Headteacher.

Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

7. Storage and Retention of CCTV images / Recording procedures

Footage is recorded onto a hard drive and under normal circumstances the recordings are retained until the hard drive is full (approximately 4 weeks) and then recorded over.

Access to the hard drive is password protected. During this period, incident recordings

can be reviewed and if necessary, copied to a USB or sent via secure email as a digital recording for permanent retention as evidence of criminal activity.

Incident recordings may be viewed by the police for the prevention and detection of crime. Viewings of recordings by the police, or other authorised applicants, must be entered in the register/log (see Appendix B). A register/log will be maintained of the release of any incident digital recordings to the police or other authorised applicants. Should a recording be required as evidence, a digital copy may be released to the police in accordance with the following procedures:

- If a USB is used to record footage, they must be newly formatted or unused. The controller shall register the date and time of the recording.
- A recording required for evidential purposes must either be sent via the school's admin email address (which will be encrypted) or sealed, witnessed, signed by the controller, dated and stored in the school safe.
- Recordings will only be released to the police on the clear understanding that the footage remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this policy and the Data Protection Act. The school retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained thereon.
- The police may require the school to retain the stored recordings for possible use as evidence in the future. Such recordings will be properly registered and securely stored in the school safe until they are needed by the police.
- Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Headteacher. In these circumstances recordings will normally be released where satisfactory documentation is produced showing that they are required for legal proceedings, a subject access request or in response to a Court Order. A fee can be charged in such circumstances.

Data obtained by CCTV may be used within the School's Disciplinary and Grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

8. Breaches of the code

Any breaches of this CCTV Policy by school staff will be initially investigated by a member of the Senior Leadership Team (SLT), in order to recommend further action, if necessary.

9. CCTV Access and GDPR Compliance Statement

Under Data Protection legislation, CCTV footage is considered personal data and, in certain circumstances, may be subject to access through a Subject Access Request (SAR).

However, there are specific exemptions and significant considerations that would prevent us from granting access to this footage.

Some examples of exemptions that may apply, and therefore restrict us from being able to provide the footage would include:

- Presence of other individuals: If the footage includes images or recordings of other individuals, in order to protect their rights
- Data Subject's Rights: If granting access would infringe on the rights of others captured in the footage (e.g. the rights to privacy, confidentiality or security)
- Ongoing Investigations or Legal Proceedings: If the footage is part of an ongoing investigation or legal proceedings, disclosing it could compromise the investigation or result in a legal violation.
- Excessive or Vague Requests: If the request is deemed overly broad or lacks sufficient detail to identify specific footage, we may not be able to provide access. Requests should be clear and focused on specific incidents or timeframes.
- Security Risks: If providing access to the footage could compromise the security of the premises or other individuals (e.g. revealing security procedures, demonstrate limitations in our coverage or highlight sensitive areas), access may be restricted.

While we will review all requests on a case-by-case basis, please be aware that, due to the nature of those aforementioned exemptions, we are not always able to grant access to CCTV footage.

The school does not have the facility to provide copies of CCTV footage but instead, the applicant may view the CCTV footage, if required.

10. Data Protection Impact Assessment and Privacy by Design

CCTV has the potential to be privacy intrusive. The School will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using a new surveillance system to ensure that the use is necessary and proportionate and address a pressing need identified.

11. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Data Protection Officer, Mrs Sarah Mark. Email: dpo@groveswood.essex.sch.uk. Tel: 01268 743445.

12. Further Information

Further information on CCTV and its use is available from the following:

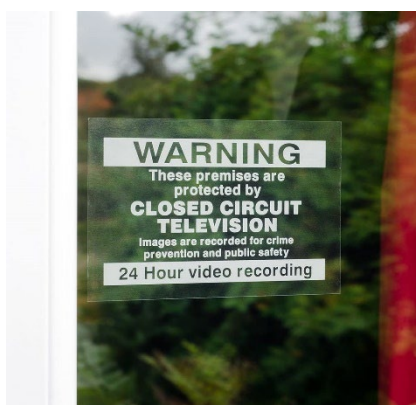
- CCTV Code of Practice (published by the Information Commissioner's Office): <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/>
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- UK General Data Protection Regulation

Appendix A – CCTV signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The School is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purposes of using CCTV
- The name of the School
- The contact telephone number or address for enquiries

Example Sign



Appendix B – CCTV viewing of Incident Recording

| Recording Number | Date & Time of Incident | Name of authorised person viewing recording and date | Date of recording | Name of authorised person recording released to and date | Date of destruction of digital destruction |
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