

Windlesham Village Infant School CCTV Policy

Adopted: 2/11/2020

Review Date: 2/1/2021

1. Policy Statement

Windlesham Village Infant School uses Close Circuit Television (“CCTV”) within the premises. The purpose of this policy is to set out the position of Windlesham Village Infant School as to the management, operation and use of the CCTV.

This policy applies to all members of our Workforce, visitors to our premises and all other persons whose images may be captured by the CCTV system.

- This policy takes account of the applicable legislation and guidance, including:
- General Data Protection Regulations (“GDPR”)
- Data Protection Act 2018 (together the Data Protection Legislation)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

Purpose of CCTV

Windlesham Village Infant School uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors.
- To prevent the loss of or damage to the Windlesham Village Infant School buildings and/or assets.
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

Description of system

There are three cameras, with fish-eye lenses which are fixed. They do not have sound recording capabilities, but images are still captured when it is dark.

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 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. Windlesham Village Infant School will make all reasonable efforts to ensure that areas outside of the Windlesham Village Infant School premises are not recorded.

Signs will be 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.

Privacy Impact Statement

Prior to the installation of the CCTV system a privacy impact assessment was conducted by the installer to ensure that the proposed installation is compliant with legislation and ICO guidance.

Windlesham Village Infant School will adopt a privacy by design approach when installing any new cameras or systems, considering the purpose of each camera to avoid recording and storing excessive amounts of personal data.

Management and access

The CCTV system will be managed by the Headteacher, with support from the IT Technician. On a day to day basis the CCTV system will be operated by the IT Technician.

The viewing of live CCTV images will be restricted to staff responsible for granting access to the site. Recorded images which are stored by the CCTV system will be restricted to access by the Headteacher and Data Protection Officer.

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.

The CCTV system is checked monthly by the IT support to ensure that it is operating effectively. This is done by logging in and checking it is recording.

Storage and Retention of Images

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.

Recorded images are stored only for a period of 30 days unless there is a specific purpose for which they are retained for a longer period. The images are automatically destroyed by the system.

Windlesham Village Infant 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 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 the school.

Disclosure of Images to Data Subjects

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.

Any individual who requests access to images of themselves will be considered to have made a subject access request (SAR) pursuant to the Data Protection Legislation. Such a request should be considered in the context of the TAMAT Data Protection Policy.

When such a request is made the Headteacher/Data Protection Officer will review the CCTV footage, in respect of relevant time periods where appropriate in accordance with the request.

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 Headteacher/Data Protection Officer must take appropriate measures to ensure that the footage is restricted in this way.

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

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

- When the request was made
- The process followed by the Headteacher/Data Protection Officer 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 and if so to whom, when and in what format.

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 Legislation.

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

If a request is received from a law enforcement agency for disclosure of CCTV images, then the Headteacher/Data Protection Officer must follow the same process as above in relation to subject access requests (SAR). Details should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any 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.

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

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.

Review of Policy and CCTV System

This policy will be reviewed annually.

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

Misuse of CCTV System

The misuse of CCTV system could constitute a criminal offence.

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

Complaints Relating to this Policy

Any complaints relating to this Policy or the CCTV system operated by Windlesham Village Infant School should be made in accordance with the Windlesham Village Infant School Complaints Policy.

CCTV Impact Assessment Template

1. Who will be captured on CCTV?

Pupils, staff, parents/carers, volunteers, governors and other visitors including members of the public.

2. What personal data will be processed?

Facial images, behaviour, possibly car registration if it is visible

3. What are the purposes for operating the CCTV system?

Set out the problem that the school is seeking to address and why the CCTV is the best possible solution and the matter cannot be addressed by way of less intrusive means

Prevention and/or detection of crime.
Recognition of visitors before they enter the school building for safer security

4. What is the lawful basis for operating the CCTV System?

Legal obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime.

5. Who is/are the named person(s) responsible for the operation of the system?

Mrs Naomi Ezzard (Headteacher)
Ms Ann Johnstone (Data Protection Officer)

6. Describe the CCTV system including locations:

- a. Clear images are produced so that they can be used for the purpose for which they were obtained.
- b. There are three cameras – sited at the main pedestrian entrance at the front of the school, one camera give a view of the gate into the back playground, the final camera gives a view of the gate where pupils enter/leave the site which is situated at the back part of the playground.
- c. Signs are displayed to notify individuals that CCTV is in operation. Three signs are in place – front, side and rear of the building.

d. It may be possible for third party data to be redacted by blurring out other individuals, this is dependent on the IT Provider being able to carry out this task.

7. Set out the details of any sharing with third parties, including processors?

We do not share with third parties or processors; our entire system is held onsite.

8. Set out the retention period of any recordings, including why those periods have been chosen.

Recordings are held for 30 days then destroyed in accordance with regulations

9. Set out the security measures in place to ensure that recordings are captured and stored securely

Recordings are held in a locked cupboard in the Headteacher's Office

10. What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

Recording individuals without their knowledge
What are the risks to unlawful access being gained
Possible data breach risks
Risk of transferring data to authorities (ie police) or disclosed to any third party

11. What measures are in place to address the risks identified?

Footage would only ever be used if investigating a specific event/period

12. Have parents been consulted as to the use of the CCTV system? IF so, what views were expressed and how have these been accounted for?

Views of parents has not been sought

13. When will the Privacy Impact Assessment be Reviewed?

This will be carried out annually in line with the Policy

This Policy was approved by the LAB of Windlesham Village Infant School on: