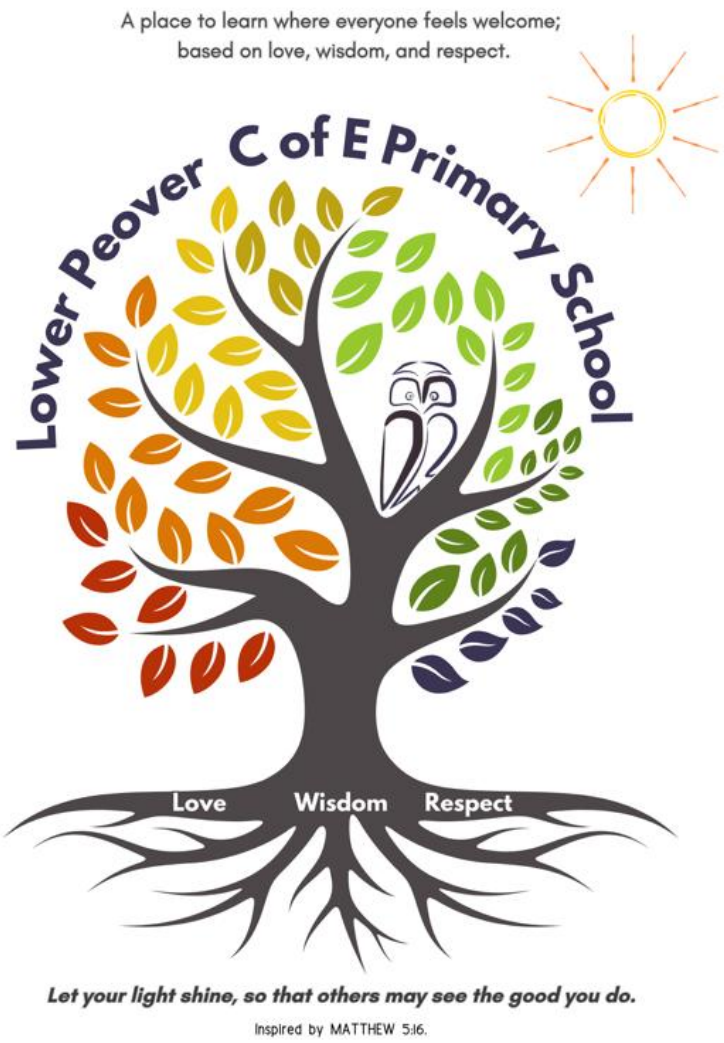

CCTV Policy

Review Date:	**September 2027**

Lower Peover Primary School uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime, and to monitor the school buildings in order to provide a safe and secure environment for pupils, staff, and visitors, and to prevent the loss or damage to school property.

CCTV surveillance at the School is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours.
- reducing the incidence 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.
- safeguarding children, staff, and visitors
- a deterrent for violent behaviour
- To review damage or injury inflicted due to verbal abuse and/or violent behaviour

The system comprises of 10 fixed cameras (no audio) around the exterior of the school site. Three fixed cameras (with audio) are also located in the following interior areas of school:

- Main entrance "holding" lobby
- Main entrance lobby
- Head Teacher's office

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

The CCTV is monitored centrally from the School Business Manager's office.

The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the school's use of CCTV and how it complies with the Act.

The authorised operator, with access to images, is aware of the procedures that need to be followed when accessing the recorded images. The operator is trained in their responsibilities under the CCTV Code of Practice. Access to the images and recordings will be limited to the Senior Leadership Team, which comprises of the Head Teacher, Deputy Head Teacher, School Business Manager and School Inclusion Manager.

The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The use of the CCTV system will be conducted in a professional, ethical, and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

Justification for Use of CCTV

The use of external CCTV is to control the perimeter of the school buildings for security purposes, that has been deemed to be justified by the senior leadership team and Governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of anti-social behaviour.

The use of the interior CCTV cameras is to monitor and review any damage or injury inflicted due to violent behaviour, and to safeguard those dealing with such incidents.

Data Protection Impact Assessments

Where new CCTV systems or cameras are to be installed, the School will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, parents, and local residents.

Where existing CCTV systems are in operation as of May 2018, the school will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3-year period from the date of the implementation of GDPR, whichever is sooner.

Location of Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated.

The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will not be used in classrooms; however, 3 cameras are located in the interior locations of main entrance, entrance lobby and Head Teachers office to safeguard staff against verbal abuse and/or violent behaviour.

Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Lower Peover Primary School has endeavoured to select locations for the installation of CCTV cameras, which are least intrusive to protect the privacy of individuals.

Cameras placed to record 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 may include the following:

- ***Protection of school buildings and property:*** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
- ***Monitoring of Access Control Systems:*** Monitor and record restricted access areas at entrances to buildings and other areas
- ***Verification of Security Alarms:*** Intrusion alarms, exit door controls, external alarms
- ***Video Patrol of Public Areas:*** Parking areas, Main entrance/exit gates, Traffic Control
- ***Criminal Investigations (carried out by police):*** Robbery, burglary, and theft surveillance

Covert Surveillance

Lower Peover Primary School will not engage in covert surveillance.

Notification

A copy of this CCTV Policy is provided on request to staff, students, parents, and visitors to the school and is available on the school website.

The location of CCTV cameras will also be indicated, and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

Adequate signage will also be prominently displayed at the entrance to Lower Peover Primary School property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Appropriate locations for signage will include:

- at entrances to premises i.e external doors, school gates
- reception area
- at or close to each internal camera

Storage and Retention

The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept.

Access will be restricted to the authorised personnel of the Senior Leadership Team. Supervising the access and maintenance of the CCTV System is the responsibility of the Data Protection Lead. The Headteacher may delegate the administration of the CCTV System to another staff member in the absence of the DPO.

In certain circumstances, the recordings may also be viewed by other school staff or Governors in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Files will be stored in a secure environment with a log of access to files kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

Access

Recorded footage and the monitoring equipment 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. A log of access to footage will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only.

When accessing images two authorised members of staff must be present.

A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

In relevant circumstances, CCTV footage may be accessed:

- By the police where Lower Peover Primary School (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- 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 Lower Peover Primary School property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Headteacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the school insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to **themselves** under the Data Protection Act.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time, and location.

The school will respond to requests within 30 calendar days of receiving the request in line with the school's right of access policy.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

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

Where footage contains images relating to 3rd parties, the school will take appropriate steps to mask and protect the identities of those individuals.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Staff Training

Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

Staff misuse of surveillance system information will lead to disciplinary proceedings.

Responsibilities

The Headteacher (or nominated deputy) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Lower Peover Primary School
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Lower Peover Primary School
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Lower Peover Primary School is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Consider both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place

- Co-operate with the Health & Safety Officer of Lower Peover Primary School in reporting on the CCTV system in operation in the school
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

If you have any questions, please contact the School Data Protection Lead on dpo@lowerpeover.cheshire.sch.uk