

# **CCTV Policy**

## **December 2024**

### **Bushmead Primary School**



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## **1. Aims**

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Bushmead Primary School. The system comprises a number of fixed cameras located around the school site. All cameras are monitored from the SENDCo's office.

- This Code follows Data Protection Act guidelines.
- The CCTV system is owned by the school.
- The main purpose of the system is as a deterrent to intruders.

## **2. Legislation and guidance**

This policy has due regard to legislation and statutory guidance, including, but not limited to the following:

- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The General Data Protection Regulation (GDPR)
- The Data Protection Act 2018 and all associated UK GDPR Legislation
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 2004
- The Equality Act 2010

This policy has been created with regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- Information Commissioner's Office (ICO) (2017) 'Overview of the General Data Protection Regulation (GDPR)'
- ICO (2017) 'Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'

## **3. Definitions**

For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:

- Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable.
- Overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.
- Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance. Bushmead Primary School does not condone the use of covert surveillance when monitoring the school's staff, pupils and/or volunteers. Covert surveillance will only be operable in extreme circumstances. Any overt surveillance footage will be clearly signposted around the school.

## **4. Roles and responsibilities**

### **4.1 The Governor/s**

- Work with the head teacher to determine the strategic development of the CCTV policy and provision in the school.
- The Governing Body will review this policy in line with the Policy review schedule at the FGB meetings.

### **4.2 The head teacher**

The head teacher will:

- Work with staff, parents and governors to determine the strategic development of the CCTV policy and provision in the school.
- Liaise with the site manager regarding the day-to-day management of the CCTV system.

## **5. Objectives of the CCTV scheme**

- To protect the school buildings and assets.
- To increase personal safety and 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.
- To protect members of the public and private property.

## **6. Statement of intent**

- The school will treat the system, and all information, documents and recordings obtained and used as data which are protected by the Data Protection Act.
- Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- Cameras are not to focus on private homes, gardens and other areas of private property.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Material will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Material will never be released to the media for purposes of entertainment.

- The planning and design has endeavored to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

## **7. Operation of the system**

- The day-to-day management will be the responsibility of both the Senior Management Team and the Site Manager.
- The CCTV system will be operated 24 hours each day, every day of the year.
- BeeTee are contracted to maintain the system.
- The Site Manager checks and confirms the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.
- CCTV information, LA Guidance and CCTV records are kept in Apple Room.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.
- Data is stored for 19 days.

## **8. Monitoring procedures**

- Camera surveillance is maintained at all times.
- A monitor is installed in the SENDCo's office to which pictures are continuously recorded.
- Images are stored on the hard drive for 19 days before being automatically deleted.
- Images can be recorded onto a CD Rom/DVD or memory stick if required.

## **9. Recording procedures**

In order to maintain and preserve the integrity any CD Rom/DVD or memory stick, copies used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- The CD Rom/DVD or memory is clearly labelled and sealed in a plastic box or envelope before being handed over to a Police Officer
- CCTV footage may be viewed by the Police for the prevention and detection of crime.
- Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.
- Should footage be required as evidence, a copy may be released to the Police (as in bullet point one). Footage will only be released to the Police on the clear understanding that the CD Rom/DVD or memory stick remains the property of the school, and both the CD Rom/DVD and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the CD Rom/DVD or memory stick or any part of the information contained thereon. On occasions when a Court requires the release of original footage this will be produced from the secure evidence store, complete in its sealed bag.
- The Police may require the school to retain the stored CD Rom/DVDs or memory stick for possible use as evidence in the future. Such CD Rom/DVDs will be properly indexed and properly and securely stored until they are needed by the Police.
- Applications received from outside bodies (e.g. solicitors) to view or release footage will be referred to the Headteacher. In these circumstances recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.

## 10. Breaches of the code (including breaches of security)

- Any breaches in security by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action.
- Any serious breach of security will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach. Our DPO will be advised.
- Performance monitoring, including random operating checks, may be carried out by the Head Teacher or Caretaker.

## 11. Complaints

- Any complaints about the school's CCTV system should be addressed to the Headteacher..
- Complaints will be investigated in accordance with breaches detailed above.

## 12. Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the Headteacher.

## 13. Monitoring arrangements

This policy and information report will be reviewed by the FGB meeting every 3 years. It will also be updated if any changes to the information are made during the year.

It will be approved by the governing board.

## 14. Links with other policies and documents

This policy links to our policies on: UK GDPR and Freedom of Information Policy

<b>Version:</b>	4
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<b>Written by:</b>	Ann Coffey	<b>Date:</b> Dec 2024
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<b>Last reviewed by governors:</b>	Spring 1 2025
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<b>Next review due by:</b>	Spring 1 2028
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