

# **SLIMBRIDGE PRIMARY SCHOOL**

## **CCTV POLICY and Code of Practise**

Slimbridge Primary School will provide children with an educational environment where they are happy, have equal opportunities and are provided with a wide ranging academic, creative and social curriculum and extended services which will allow them to achieve to the best of their potential.

### **1. Introduction**

- 1.1 Slimbridge School uses closed circuit television (CCTV) images to reduce crime and 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.
- 1.2 The system comprises of 5 fixed cameras.
- 1.3 The system has sound recording capability for the entrance foyer camera only.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's business team.
- 1.5 The CCTV is monitored centrally from the Head's office by the Admin Team.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school governors.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the School Business Manager in their responsibilities in line with the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

### **2. Statement of Intent**

- 2.1 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 Code of Practice is published at:

[http://www.ico.gov.uk/~media/documents/library/Data\\_Protection/Detailed\\_specialist\\_guides/ICO\\_CCTVFINAL\\_2301.ashx](http://www.ico.gov.uk/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.ashx)

- 2.2 CCTV warning signs will be clearly and prominently placed on external entrances to the school, including school gates. The main signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the school will ensure that there are

prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

- 2.3 The planning and design has endeavoured 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.

### **3. Siting the Cameras**

- 3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) 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.
- 3.2 The school makes every effort to position cameras so that their coverage is restricted to the school premises, including outdoor areas.
- 3.3 CCTV is not used in classrooms.
- 3.4 Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### **4. Covert Monitoring**

- 4.1 The school may in exceptional circumstances set up covert monitoring. For example:
- i) 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;
  - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 Currently all CCTV are fixed and cannot be moved.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

### **5. Storage and Retention of CCTV images**

- 5.1 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 5.2 All retained data will be stored securely.

### **6. Access to CCTV images**

- 6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

## **7. Subject Access Requests (SAR)**

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 7.2 All requests should be made in writing to the Headteacher. 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.
- 7.3 The school will respond to requests within 40 calendar days of receiving the written request and fee but if a request is received outside of the school term this may not be possible.
- 7.4 A fee of £10 will be charged per request or as otherwise agreed with the School Management Team.
- 7.5 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

## **8. Access to and Disclosure of Images to Third Parties**

- 8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- 8.2 Requests should be made in writing to the Headteacher.
- 8.3 The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## **9. Complaints**

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

## **10 Data Protection Impact Assessments 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 new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

## **11. Policy Review**

The Full Governing Board is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

## **Further Information**

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

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- [www.ico.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998