

BOURN C of E PRIMARY ACADEMY

CLOSED CIRCUIT TELEVISION (CCTV) POLICY



Premises
Jan 2019

1. Introduction

- 1.1. Bourn Primary Academy uses closed circuit television (CCTV) images to monitor the School entrance in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to School property and reduce crime.
- 1.2. The system comprises one fixed camera.
- 1.3. The system does not have sound recording capability.
- 1.4. The CCTV system is owned and operated by the School, the deployment of which is determined by the School's leadership team.
- 1.5. The CCTV is monitored centrally from the School Office by the office staff.
- 1.6. Changes to CCTV monitoring will be subject to consultation with staff and the School community.
- 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. All operators are trained by the School data controller in their responsibilities under 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:
<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>
- 2.2. CCTV warning signs will be clearly and prominently placed at all external entrances to the School site (see Appendix B). 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 have 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 area of coverage.

3. Siting the Cameras

- 3.1. Cameras will be 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 will make every effort to position cameras so that their coverage is restricted to the School premises, which may include outdoor areas.
- 3.3. CCTV will not be used in classrooms.
- 3.4. Members of staff will have access to details of where CCTV cameras are situated.

4. Storage and Retention of CCTV images

- 4.1. 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.
- 4.2. All retained data will be stored securely.

5. Access to CCTV Images

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

6. Subject Access Requests (SAR)

- 6.1. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 6.2. All requests should be made in writing to the Head Teacher. 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.
- 6.3. The School will respond to requests within 40 calendar days of receiving the written request and fee.
- 6.4. A fee of £10 will be charged per request.
- 6.5. 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.

7. Access to and Disclosure of Images to Third Parties

- 7.1. 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).

7.2. Requests should be made in writing to the Head Teacher.

7.3. 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.

8. **Complaints**

8.1. Complaints and enquiries about the operation of CCTV within the School should be directed to the Head Teacher in the first instance.

9. **Further Information**

9.1. 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
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998

Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Head Teacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Bourn Primary Academy has considered the need for using CCTV and has decided it is required for protecting the safety of pupils, staff and visitors and the prevention and detection of crime. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Renewed annually	Business Manager	
There is a named individual who is responsible for the operation of the system.	Laura Latham	Head Teacher	
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Termly	Health and Safety Committee	
Cameras have been sited so that they provide clear images.	Yes		
Cameras have been positioned to avoid capturing clear images of persons not visiting the premises.	All cameras within School boundary. Images only clear within boundary		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Sign on perimeter fence and office window		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Recorder in attended office. Only accessed on request		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Images only accessed on request		
Except for law enforcement bodies, images will not be provided to third parties.	Agreed on policy		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Maintenance contract		

Appendix B – Named Officers

The following are named officers within the policy:

Name	Designation	Responsibility
Laura Latham	Head Teacher	System owner, day to day management of the systems and maintenance of the policy
Helen Culley Sarah Wheatman	Assistant Head Teachers	To deputise when the system owner is unavailable

The Head Teacher may identify officers who are delegated with the authority to review recordings made on CCTV surveillance equipment. These are currently:

Name	Designation
Jane Handy	Business Manager
Debs Paul	School Administrator

Appendix C – CCTV Signage and Camera Locations

It is a requirement of the Data Protection Act 1998 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 name of the School
- The contact telephone number or address for enquiries



Appendix D – Data Protection Act

The Data Protection Act 1998: Data Protection Principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:
 - a. at least one of the conditions in Schedule 2 is met, and
 - b. in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles; for further information refer to the Data Protection Act.