



Birchington CE Primary School CCTV Policy

LEARNING AND GROWING; SAFE IN GOD'S LOVE

Policy written by:

Mr J Forwood – Deputy Headteacher

Approved by Governing Body in:

October 2023

Date to be reviewed:

September 2025

School's Data Protection Lead (DPL):

Mr J Forwood, Deputy Headteacher & Deputy DSL

School's Data Protection Officer (DPO):

Invicta Law Ltd.

Governor with lead responsibility:

Ms L Bant Chair of Governors & Safeguarding Governor

Purpose

- The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Birchington Church of England Primary School, hereafter referred to as 'the school'.
- The CCTV system is installed (both internally and externally) on the premises for the purpose of enhancing security of the building, and its associated equipment, as well as creating a mindfulness among the occupants, at any time, that a surveillance security system is in operation within and in the external environs of the premises during both the daylight and night hours each day.
- CCTV surveillance at the school is intended for the following purposes only:
 - protecting the school buildings and its 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; and
 - promoting the health and safety of staff, pupils and visitors

Scope

- This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material
- The school has a statutory responsibility for the protection of its property, equipment and other plant as well as providing a sense of security to its employees, pupils and visitors to its premises. The school owes a duty of care under the provisions of the *Health and Welfare at Work etc Act 1974* and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school
- The school complies with the *ICO's Surveillance Camera Code of Practice (June 2013, updated November 2021) (SCOP 2013)*
- The School's CCTV is registered with the Information Commissioner under the terms of the *Data Protection Act 2018 (DPA 2018)* and the *UK General Data Protection Regulation (GDPR) 2016/679*
- The CCTV system is owned and operated by the school, the deployment of which is determined by the school's Senior Leadership Team
- The school is the body that makes the decisions concerning CCTV, for example, who has responsibility for the control of the images, i.e. deciding what is to be recorded, how the images should be used and to whom they may be disclosed
- All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. Recognisable images captured by CCTV systems are 'personal data' and the school is the data controller and data processor of them. Recognisable images captured by CCTV systems are therefore subject to the provisions of the *UK GDPR and DPA 2018*
- The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage
- CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including the provisions set down in equality and other educational and related legislation
- This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc
- Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy

- Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school
- CCTV systems will not be used to monitor normal teacher/pupil class activities in school
- It may be necessary to use CCTV system to ascertain the whereabouts of children if they are lost/abscond within the school grounds
- The use of CCTV to control the perimeter of the school buildings for security purposes, the Computer Suite and the main entrance to the school has been deemed to be justified by governors.

Location of cameras

- The system comprises of 10 cameras (2 internal and 8 external)
- The cameras are in operation 24/7
- The external cameras are sited to be able to capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated
- The school has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.
- The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation and for the personal safety of staff, children and visitors
- CCTV video monitoring and recording of public areas will include the following (all external except where noted):
 - In main entrance lobby above office hatch (internal)
 - Computer Suite (internal)
 - Front of Mr Mac building – overlooking top end of Year R/1 playground
 - EYFS outside classroom
 - Four corners of Rossetti building
 - Two back doors to Mr Mac building

Covert monitoring

- The school does not engage in covert surveillance

Access to CCTV images

- Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Deputy Headteacher, Mr Forwood, who may delegate the administration of the CCTV System to other members of staff. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.
- The authorised individuals are Mrs Wilson (Headteacher), Mr Forwood (Deputy Headteacher), Mr Horsburgh (IT Network Manager), Mr Drew (Site Manager) and Mr Franklin (Assistant Site Manager and Assistant IT Network Manager).
- All authorised individuals with access to images are aware of the procedures that need to be followed when accessing the recorded images. All these individuals are made aware of their responsibilities in following the *SCOP 2013*.
- All school employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

- In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Police, other members of staff, representatives of the Department of Education or representatives of the HSE).

Storage and retention of CCTV images

- The school will store data securely at all times
- Storage of CCTV images is on 3 separate Digital Video Recorders (DVRs – one in Quex, one in Mr Mac and one in Rossetti), which are capable of recording 30 days of 24/7 recording on a rolling 30-day basis, or on encrypted USB sticks (held in the school safe)
- Each camera saves to the local DVR
- All CCTV cameras can be remotely controlled from, and the images viewed from, the dedicated standalone computer located in the Site Team's office. No images are saved on this computer. This office is kept locked when not occupied
- The standalone computer is password protected, kept 'locked' when not being used and the password is only known by the authorised individuals mentioned above
- Logs will be maintained for:
 - viewing any images via access to the standalone computer – **Access Log**
 - the saving (and deletion of) of any images on encrypted USB sticks – **Saved Images Log**
 - the releasing of any images to third parties – **Disclosure Record Log**
- Recorded data on encrypted USB sticks will not be retained for longer than 30 days from the date of the image except where the image identifies an issue, specifically in the context of an investigation/prosecution of that issue and the school has been informed that it needs to retain the images for longer
- The CCTV system software does have the ability to blur images once they have been recorded onto an encrypted USB stick

Notification and Signage

- The school will provide a copy of this CCTV Policy, on request, to staff, pupils and visitors to the school
- The poster below will be displayed at the main entrance to the school office and a variety of CCTV signs will be displayed across the school site



WARNING

CCTV cameras in operation on this site

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, for the safety of our staff, pupils and visitors and for the protection of Birchington Church of England Primary School and its property.

This system will be in operation 24 hours a day, every day. These images may be passed to Police if requested.

This system is controlled by Birchington Church of England Primary School. For more information, visit our website at www.birchington-primary.com or call 01843 841046 during school hours

Subject Access Requests

- Individuals have the right to request CCTV footage relating to themselves under the *DPA 2018* and the *UK GDPR*.
- All requests should be made to Mr Jonathan Forwood, Deputy Headteacher/Data Protection Lead. Individuals submitting request for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location. Identification of the individual requesting images may be requested by the school where appropriate
- The school does not have the facility to provide copies of CCTV footage (except to the Police and for Court Orders etc) but instead the applicant may view the CCTV footage, if available and appropriate.
- The school will respond to requests within 1 calendar month of receiving the request but if a request is received outside of the school term this may not be possible
- 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

Access and disclosure of images to third parties

- There will be no disclosure of recorded data to third parties without a lawful basis. It is acceptable for the school to disclose images to, for example, the Police for the purpose of prevention and detection of crime
- If an order is granted by a Court or the Police for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what is required
- Applications received from such outside bodies to view or release recordings will be referred to the Headteacher. In these circumstances recordings will normally be released where satisfactory documentation is produced showing that they are required for legal proceedings, a Subject Access

Request, or in response to a Court Order. 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

- The Police or a Court may require the school to retain the stored recordings for possible use as evidence in the future and beyond the normal retention period of 30 days
- Such recordings will be properly registered and securely stored on encrypted USB sticks (held in the school safe).
- Should a recording be required as evidence, a digital copy will be released in accordance with the following procedures:
 - each recording must be identified by a unique reference number
 - saved on a brand new and unused encrypted data stick sealed, witnessed, signed by the Headteacher, dated and stored in the school safe.
- Viewing or releasing of any CCTV images or recording to third parties will be entered into a Disclosure Record Log. The log will record a unique reference number, the date, time periods and camera viewed on. It will also include with the details of the third party requesting the image/s, date access requested, and the date the image/s were released/viewed and whether they were released or viewed
- Recordings will only be released to the Police/Court on the clear understanding that the footage remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this policy and the *DPA 2018*.
- The school retains the right to refuse permission for the Police/Court to pass to any other person the recording or any part of the information contained thereon
- Requests for images should be made in writing to the Data Protection Lead, Jonathan Forwood

Responsibilities

- The Deputy Headteacher will:
 - Ensure that the use of CCTV systems is implemented in accordance with this policy
 - Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school
 - Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
 - Ensure that the CCTV monitoring 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
 - Periodically review the 'Access Log', 'Saved Images Log' of and 'Disclosure Record Log' to ensure they are kept in compliance with this policy
 - Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
 - Give consideration to both pupils 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
 - 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 records are stored in a secure place with access by authorised personnel only
 - Ensure that images recorded are stored for a period not longer than 30 days and are then erased, unless images are required as part of a criminal investigation or court proceedings (criminal or civil) and need to be saved separately on encrypted USB sticks and kept for 30 days from the date of the image, unless a criminal authority has requested that they are kept for longer
 - Ensure that camera control is to monitor suspicious behaviour, criminal damage, and ascertain whereabouts of children if they are lost etc. and not to monitor individual characteristics
 - Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas
 - Liaise with the DPO for advice/guidance where it may be relevant or necessary

Privacy impact assessment and privacy by design

- CCTV has the potential to be privacy notice 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

Policy Review

- The Data Protection Lead 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