



# **Thorner's Church of England VA Primary School** **CCTV Policy**

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## **1. Statement of Intent**

1.1 At Thorner's Church of England VA Primary School (the "**School**") we take our responsibility towards the safety of staff, pupils and visitors very seriously. To that end, we use surveillance cameras outside the buildings to monitor any instances that may cause harm to our school or to any of its members.

1.2 The purpose of this Policy is to manage and regulate the use of the CCTV system at the school and to ensure that:

- We comply with data protection legislation. (See Section 5.1).
- The images that are captured are useable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation

## **2. Objectives**

2.1 The surveillance system will be used to:

- Maintain a safe environment.
- Ensure the welfare of pupils, staff and visitors.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.

2.2 Under no circumstance will CCTV be used within the school buildings or in any changing facility.

## **3. Siting and Operation of the System**

3.1 The system comprises three fixed cameras. Two are located at the rear of the building and overlook the playing field and the area up to the gate to the LATCH car park respectively. The third camera, which has a number plate recognition capability, is located at the front of the School and overlooks the School car park and main gate.

3.2 The system does not have sound recording capability.

3.3 The CCTV system is owned and operated by the school.

3.4 The CCTV is monitored centrally from the school office by the Headteacher and the Office Manager.

3.5 All staff with access to images are aware of the procedures that need to be followed when accessing the recorded images.

3.6 CCTV warning signs are clearly and prominently placed at all external entrances to the school, including school gates.

3.7 Recorded material will be stored in a way that maintains the integrity of the information. This is to ensure that the rights of individuals recorded by the system are protected and that the information can be used only for its intended purpose.

3.8 The CCTV system has been designed to ensure that it will give maximum effectiveness

and efficiency but it is not possible to guarantee that the system will cover or detect every single incident that takes place in the areas of coverage.

3.9 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.

#### **4. Data Protection Principles**

4.1 Data collected from CCTV will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
  - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
  - Accurate and, where necessary, kept up-to-date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

#### **5. The Legal Framework and Codes of Practice**

5.1 The School's CCTV system complies with data protection legislation including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) – the latter of which came into effect on 25 May 2018.

5.2 The school's CCTV Scheme is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 2018. The use of CCTV and the associated images is covered by the Data Protection Act 2018.

5.3 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)

#### **6. Siting of the Cameras**

6.1 Cameras are sited so that they only capture images relevant to the purposes for which they are installed (See Section 2.1) and care will be taken to ensure that reasonable privacy

expectations are not violated. The location of equipment has been designed to ensure that images captured comply with the Data Protection Act 2018.

6.2 The school has made every effort to position cameras so that their coverage is restricted to the school premises.

## **7. Covert Monitoring**

7.1 The School will not use CCTV for covert monitoring.

## **8. Storage and Retention of CCTV Images**

8.1 Recorded data will be retained for no 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.

8.2 All retained data will be stored securely.

## **9. Access to CCTV Images**

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

## **10. Complaints**

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

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

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

11.2 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.

11.3 The school will respond to requests within 30 calendar days of receiving the written request.

11.4 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.

## **12. Access to, and Disclosure of, Images to Third Parties**

12.1 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).

12.2 Requests should be made in writing to the Headteacher.

12.3 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.

### **13. 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 2018

In accordance with the Equality Duty we seek to ensure that all pupils achieve their best, according to their capabilities and regardless of their special needs, disability, gender, race, culture, social, economic, ethnic, religious background and denominational diversity.

Thorner's CE VA Primary School recognises that the welfare of the child is paramount and takes seriously its responsibility to safeguard and promote the welfare of the children and young people in its care.

Date agreed by Finance and Premises Committee: February 2022

Date adopted by Governing Body: February 2025

Date to be reviewed: February 2025

## **APPENDIX A: CCTV Signage**

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school will ensure that this requirement is fulfilled.



## APPENDIX B: CCTV Checklist

This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

Thorner's School has considered the need for using CCTV and has decided it is required 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.

We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Next review Date
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.			
A system has 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.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
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).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
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.			
Except for law enforcement bodies, images will not be provided to third parties.			
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.			
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.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			