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Iver Village Junior School CCTV Policy 2021 - 2024

Children have the right to be safe Article 34/35/36/37/39

Review Date	Reviewed by	Changes
February 2021	SCA	No changes needed
February 2024		

Written By: Mrs Chapman-Allen This policy was adopted: January 2018

Purpose

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Iver Village Junior School.

The system comprises of a total of 4 fixed cameras which are located at the main entrance and common areas of the School (both internally and externally). All cameras are monitored from a Central Control point and are only available to selected senior staff.

They are for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during the daylight and night hours each day. CCTV surveillance at the School is intended for the purposes of:

- To protect pupils and staff in the school
- To protect the school buildings and their assets
- To deter potential criminal offenders
- To increase personal safety and reduce the fear of crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school

The system does not have sound recording capability.

Staff responsible will monitor standards if behaviour if cameras cover pupil areas.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

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 made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2) 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 complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

The Code of Practice is published at; https://ico.org.uk/media/1542/cctv-code-of-practice.pdf

CCTV warning signs will be clearly and prominently placed at the main external entrance to the school. Signs will contain details of the purpose for the using CCTV. In areas where CCTV is used, the school will ensure that there are prominent signs within the controlled area.

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 Equality and Diversity Policy, Codes of Practice for dealing with complaints of Bullying and Harassment and Sexual harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

The 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.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending the school.

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'. They are therefore subject to the provisions of the General Data Protection Regulations and Data Protection Act 2018.

3) Location of Cameras

The cameras are sited so that they only capture images relevant to the purpose 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 will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation.

The School will make every effort to position the cameras so that their coverage is restricted to the school premised, which includes both indoor and outdoor areas.

CCTV will not be used in classrooms but in limited areas within the school that have been identified by staff and pupils as not being easily monitored.

Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras place for the purpose of covert monitoring.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of school buildings and property:** The building's entrance and car park, lobbies and corridors, reception desk
- Monitoring of Access control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Car parking areas, Main entrance/exit gates
- Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance

CCTV signage

CCTV signage is around the school to show that cameras are in operation.

WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of Iver Village Junior School and its property. This system will be in operation 24 hours a day, every day. These images may be passed to law enforcement. This scheme is controlled and operated by Iver Village Junior School For more information contact 01753 653059

4) Covert Monitoring

The school will not engage in covert surveillance

5) Storage and Retention of CCTV images

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. The school will store data securely at all times.

6) 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 Headteacher. The Headteacher may delegate the administration of the CCTV System to another member of staff. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7) Subject Access Requests (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and GDPR.

All requests should be made in writing to the Headteacher who can be contacted by email to office@ivervillage-jun.bucks.sch.uk. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

The school can export still photographs from the CCTV system and pixelate other data subjects so that any requests can have a hand copy of the information. The person making the request can be shown the CCTV footage where it does not contravene the rights of others.

The school will respond to requests within 30 days 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.

8) Access and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than authorised personnel such as the police and service providers to the school where these would reasonable need access to the data (e.g. investigators)

Requests for images should be make in writing to the Headteacher.

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) Responsibilities

The Headteacher will:

- Ensure 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 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.
- Maintain a record of access (e.g. an access log) to material recorded or stored in the system.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both students 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 images recorded on digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

10) Privacy impact assessments and privacy by design

CCTV has the potential to be privacy intrusive. The School will perform a privacy 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

policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.					