



# **CCTV POLICY**

## **Policy Intent**

John Spence Community High School uses closed circuit television (CCTV) images within the premises of the School. This policy outlines the school's use of CCTV and how it complies with the legislation. This policy applies to all staff, visitors to the School premises, and all other persons whose images may be captured by the CCTV system.

The purpose of JSCHS School's CCTV system is 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 loss or damage to the school property. No data collected by the CCTV system will be used for any other purpose.

The system comprises of multiple fixed cameras. The system does not have sound recording capability. The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team. The CCTV is monitored centrally from the School and ICT Offices. The introduction of, or changes to, CCTV monitoring will be subject to consultation with Senior School Staff and the Data Protection Officer.

The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018 (DPA).

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 about their responsibilities under the CCTV policy.

All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound and 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/for-organisations/documents/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently displayed

## **Siting the Cameras**

Cameras will be sited so they only capture images relevant to the purposes for which they are 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 images captured comply with the legislation.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

## **Covert Monitoring**

The School retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or serious unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained beforehand from the Headteacher and Chair of Governors. Covert Monitoring may take place in classrooms when circumstances as above are satisfied. Covert Monitoring used in classrooms will never be used to observe or assess a teacher's professional performance, or to contribute to capability proceedings. Covert Monitoring will cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

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

The school retains CCTV images for 30 days.

The school stores CCTV images on the internal harddrive.

All retained data will be stored securely.

## **Access to CCTV Images**

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

## **Subject Access Requests (SAR's)**

Individuals have the right to request access to CCTV footage relating to themselves under UK GDPR.

All requests should be made in writing to [Melissa.Tunney@Johnspence.org.uk](mailto:Melissa.Tunney@Johnspence.org.uk). Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, data, time and location. The school will respond to requests within 1 calendar month of receiving the request (this may be extended during periods of school closures/holidays). 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.

If the footage contains images of other individuals, then the School must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;

- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record of disclosures must be kept and securely held. The record must set out:

- When the request was made;
- The process followed by the CCTV system administrators in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when;
- Whether a copy of the images was provided, and if so to whom, when and in what format.

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

Only authorised persons will only be able to view live and historical CCTV data, and those persons will only be able to do so at designated locations.

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) without a lawful basis.

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. 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.

Requests for images should be made in writing to the Data Protection Officer and should make reference to the name and section of the legislation that entitles them to receive the information.

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.

### **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.

### **Policy Review**

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