



## **Thorpe Acre Infant School**

# **CCTV Policy**

Approved by : Governing Body  
Date : February 2022  
Next review due by : February 2023

Reaching High, Learning and Growing Together

## **Safeguarding Statement**

At Thorpe Acre Infant School we respect and value all children and are committed to providing a caring, friendly and safe environment for all our pupils so they can learn, in a relaxed and secure atmosphere. We believe every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm. This is the responsibility of every adult employed by, or invited to deliver services at Thorpe Acre Infant School. We recognise our responsibility to safeguard all who access school and promote the welfare of all our pupils by protecting them from physical, sexual and emotional abuse, neglect and bullying.

## **GDPR Statement**

The school has arrangements in place to ensure that all personal data records held by the school are obtained, processed, used and retained in accordance with the principles of data protection (based on the Data Protection Acts).

## **Equality Impact Statement**

We have carefully considered and analysed the impact of this policy on equality and the possible implications for pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations.

## **Contents**

1. Legality .....	3
2. CCTV Signs.....	3
3. Registering the CCTV System .....	3
4. The Data Protection Act 2018 and UK GDPR .....	3
5. Objectives.....	3
6. Confidentiality .....	3
7. Copy Recordings .....	4
8. Information Sharing (Section 115, Crime and Disorder Act 1998) .....	4
9. Retention .....	4
10. Erasure .....	4
11. Covert Recording .....	4
12. Use of Recordings.....	5
13. Traceability and Record Keeping.....	5
14. Time and Date Stamping.....	5
15. Secure Storage of Recordings .....	5
16. CODE OF PRACTICE POLICY STATEMENT.....	7
17. APPENDIX A.....	9

## **1. Legality**

There are two important points within the CCTV Code of Practice 2008 which are basic points of law that must be adhered to.

## **2. CCTV Signs**

CCTV signs are erected around the building within prominent locations that clearly identify that CCTV recording is in operation. Signs are located at the entrance gates, the Resource Base entrance, the main school building entrance and inside reception.

## **3. Registering the CCTV System**

The school registration number with the Information Commissioner's office is Z7196801

## **4. The Data Protection Act 2018 and UK GDPR**

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is "Personal data" which means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

The definition of Processing is much wider in its scope than the previous legislation. "Processing", in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as:

- (a) collection, recording, organisation, structuring or storage,
- (b) adaptation or alteration,
- (c) retrieval, consultation or use,
- (d) disclosure by transmission, dissemination or otherwise making available,
- (e) alignment or combination, or
- (f) restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

## **5. Objectives**

Operators of the system have access to a clear statement of the objectives of the system and responsibilities of those involved in its operation and management and to restrict unauthorised persons from gaining access to recorded images.

## **6. Confidentiality**

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

## **7. Copy Recordings**

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

## **8. Information Sharing (Section 115, Crime and Disorder Act 1998)**

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities.

The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.

## **9. Retention**

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is 30 days.

## **10. Erasure**

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

## **11. Covert Recording**

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs, is a breach of the Data Protection Act.

However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:

- We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.
- We have reasonable cause to suspect specific criminal activity is taking place.
- That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.

We have decided in principle that we wish to adopt covert recording. We have a clear documented procedure which sets out how we determine whether the use of covert recording is appropriate in an individual case. A confidential appendix regarding our decision that covert recording is appropriate is lodged with the Head Teacher.

## **12. Use of Recordings**

The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environs
- Pupil behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals

When using CCTV footage for any of the above purposes it shall be permissible to access and enable relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below.

## **13. Traceability and Record Keeping**

Any recorded images that are copied to a third party data source, such as a video tape, memory stick, CD or DVD recordings, are identified by a unique serial number indelibly marked on the body of the media. The unique identity of the recording is obviously compromised if it is applied only to the outer cover.

Recordings must be logged and traceable throughout their life within the system. If images are copied to a third party media this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a maintenance company.

Original recordings are only found:

- a) Within the recognised secure storage system
- b) Operational in the recording device
- c) Secured in an evidence bag

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

## **14. Time and Date Stamping**

The correct time and date is overlaid on the recorded image.

These date and time settings are checked and corrected as part of the routine maintenance visits.

## **15. Secure Storage of Recordings**

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system.

Recordings and Recording/Processing equipment are located in a secured lockable enclosure accessible only to authorised persons. A register of authorised users is maintained at all times.

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Once issued, as a minimum this document shall be reviewed on an annual basis by the governing body.

To enable continuous improvement, all readers are encouraged to notify the author of errors, omissions and any other form of feedback.

## 16. CODE OF PRACTICE POLICY STATEMENT

This Code of Practice policy statement relates to the Closed Circuit Television System installed within Thorpe Acre Infant School.

The system manager is the Headteacher of Thorpe Acre Infant School and who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Other authorised personnel trained to operate the system are:

- The Premises Officer.

The objectives of the system are to:

- Assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent
- Give confidence to staff and visitors that they are in a secure environment
- Provide management information relating to Health & Safety matters
- Support pupil behaviour and discipline management.
- Record actions of staff, pupils and school visitors that may be used for disciplinary or monitoring purposes

### System

The system comprises of the following primary items:

|                                |                                               |                        |  |
|--------------------------------|-----------------------------------------------|------------------------|--|
| Recording media type           | Digital Recorder: hard drive recording system |                        |  |
| The system records images from | Colour and Black and White cameras            |                        |  |
|                                |                                               |                        |  |
| Monitors                       | 2                                             | Across the school site |  |
| Fixed cameras                  | 10                                            |                        |  |
| Moveable cameras               | 0                                             |                        |  |
| Covert cameras                 | 0                                             |                        |  |
| CCTV signs                     | 25                                            |                        |  |

The operating manuals relating to the specific items of equipment are held with the maintenance company. It is the responsibility of the Headteacher to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

## **General Principles**

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.



## 17. APPENDIX A

### SUBJECT ACCESS REQUEST

|                                                 |  |
|-------------------------------------------------|--|
| Date of footage                                 |  |
| Start time of footage                           |  |
| End time of footage                             |  |
| Cameras of required footage                     |  |
| Current time on recorder                        |  |
| Time using speaking clock                       |  |
| Person requesting footage                       |  |
| Copy of footage has been recorded to DC/DVD/USB |  |
| Serial number of copied media disk/drive        |  |

The above information and associated CCTV footage has been compiled on behalf of Thorpe Acre Infant School and Communication & Interaction Resource Base.

The footage detail above has been compiled in accordance with the CCTV Code of Practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting <https://ico.org.uk/>

Thorpe Acre Infant School and Communication & Interaction Resource Base will maintain a log of access requests detailing who the requests have been made by.

#### Issuer of the above footage

| Name | Signature | Date |
|------|-----------|------|
|      |           |      |

#### Recipient of the above footage

| Name                        | Signature | Date |
|-----------------------------|-----------|------|
|                             |           |      |
| Address                     |           |      |
| Type of identification seen |           |      |