

# Barham Primary school



## CCTV POLICY November 2022

### **1 Policy Statement**

- 1.1 The Barham Primary**
- 1.2 School uses Close Circuit Television ("CCTV") within and outside the premises of Barham Primary School site. The purpose of this policy is to set out the position of the School as to the management, operation and use of the CCTV at Barham Primary School.**
- 1.3 This policy applies to all members of our Workforce, visitors to the Barham Primary School premises and all other persons whose images may be captured by the CCTV system.**
- 1.4 This policy takes account of all applicable legislation and guidance, including:**
  - 1.4.1 General Data Protection Regulation ("GDPR")**
  - 1.4.2 Data Protection Act 2018 (together the Data Protection Legislation)**
  - 1.4.3 CCTV Code of Practice produced by the Information Commissioner**
  - 1.4.4 Human Rights Act 1998**
- 1.5 This policy sets out the position of Barham Primary School in relation to its use of CCTV.**

## **2 Purpose of CCTV**

**2.1 The Barham Primary school uses CCTV for the following purposes:**

**2.1.1 To assist with provide a safe and secure environment for pupils, staff and visitors**

**2.1.2 To assist with the prevent in loss of or damage to Barham Primary School buildings and/or assets**

**2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.**

## **3 Description of system**

**3.1 Standalone network system with 18 cameras in various locations. The system is currently not available to view from outside of the school premises. All cameras are in a fixed position and are of fixed focus type of camera .**

**3.2 The CCTV System is maintained and serviced by:**

**Intelligent security and Fire ltd .  
138 Ryefield Ave,  
Uxbridge UB10 9DA**

## **4 Siting of Cameras**

**4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.**

**4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Barham Primary School will make all reasonable efforts to ensure that areas outside of the Barham Primary School premises are not recorded.**

**4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.**

**4.4 Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.**

## **5 Management and Access**

- 5.1** On a day to day basis the CCTV system will be operated by The Facilities Manager.
- 5.2** The viewing of live CCTV images will be restricted to Head Teacher, Senior Leaders, Facilities Manager Officers Caretaking team .
- 5.3** Recorded images which are stored by the CCTV system will be restricted to access by the Head Teacher, Senior Leaders, Facilities Manager Intelligent security and Fire ltd.
- 5.4** No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

## **6 Storage and Retention of Images**

- 6.1** Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 6.2** Recorded images are stored on a rolling period of 30 days and automatically deleted after that date unless there is a specific purpose for which they are retained for a longer period.
- 6.3** Barham Primary School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
  - 6.3.1** CCTV recording systems being located in restricted access areas;
  - 6.3.2** The CCTV system being encrypted/password protected;
  - 6.3.3** Restriction of the ability to make copies to specified members of staff via written request.

## **7 Disclosure of Images to Data Subjects**

- 7.1** Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 7.2** Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of Barham School's Subject Access Request Policy.
- 7.3** When such a request is made, Facilities Manager will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 7.4** If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. Facilities Manager must take appropriate measures to ensure that the footage is restricted in this way.
- 7.5** If the footage contains images of other individuals, then Barham Primary School must consider whether:
  - 7.5.1** 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;
  - 7.5.2** The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
  - 7.5.3** If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 7.6** A record must be kept, and held securely, of all disclosures which sets out:
  - 7.6.1** When the request was made;
  - 7.6.2** The process followed by the Facilities Manager in determining whether the images contained third parties;
  - 7.6.3** The considerations as to whether to allow access to those images;
  - 7.6.4** The individuals that were permitted to view the images and when; and

**7.6.5** Whether a copy of the images was provided, and if so to whom, when and in what format.

**7.7** When a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) the requester is entitled to a copy in a permanent form. Barham Primary School will consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to access by viewing the images only then a permanent copy will not be provided. However if a permanent copy is requested then this will be provided unless to do so is not possible or would involve disproportionate effort.

## **8 Disclosure of Images to Third Parties**

**8.1** Barham Primary School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

**8.2** CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

**8.3** If a request is received from a law enforcement agency for disclosure of CCTV images, then Facilities Manager must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

**8.4** The information above must be recorded in relation to any disclosure.

**8.5** 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.

## **9 Review of Policy and CCTV System**

**9.1** This policy will be reviewed Annually.

**9.2** The CCTV system and the privacy impact assessment relating to it will be reviewed Annually.

- 9.3 The privacy impact assessment (PIA) relating to the system will be reviewed regularly to ensure that the use of any CCTV system continues to be justified and is compliant with legal requirements.
- 9.4 Barham Primary School should ensure that it has procedures in place to ensure that the CCTV system is regularly reviewed.

## 10 Complaints relating to this policy

- 10.1 Any complaints relating to this policy or to the CCTV system operated by Barham Primary School should be made in accordance with Barham Primary School Complaints Policy or via the Head Teacher in writing

Completed by P.Haines 28<sup>th</sup> November 2022.

Check by : S. Van Amstel 28<sup>th</sup> November 2022

Recommended annual review date: November 2023

Governor's adoption of policy Date:

# CCTV PRIVACY IMPACT ASSESSMENT

**1 Who will be captured on CCTV.**

Pupils, staff, parents/carers, volunteers, governors and other visitors including members of the public.

**2 What personal data will be processed?**

Facial Images, behaviour, car registration plates, individuals' movements

**3 What are the purposes for operating the CCTV system? Set out the problem that Barham Primary School is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.**

To provide a safe and secure environment for pupils, staff and visitors

To assist with controlling the loss or damage to Barham Primary School buildings and/or assets

To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

CCTV is acknowledged as the most appropriate and effective solution to achieve these purposes in a school setting.

**4 What is the lawful basis for operating the CCTV system?**

**Public Task:** providing a safe and secure educational environment

**Legal Obligation:** to comply with Health and Safety Legislation

**Legitimate Interests:** to prevent loss of or damage to the School's buildings and/or assets

- 5 Who is/are the named person(s) responsible for the operation of the system?

Karen Giles, Peter Haines , Paulette Williamson

- 6 Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. siting of the cameras and why such locations were chosen;
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and

- 18 cameras.
- All cameras are in a fixed position
- Camera locations chosen to give maximum coverage of the school grounds and the perimeter
- Signage is installed at the main entrance to the School buildings with additional signage areas where cameras are installed
- The system does not allow for redaction of third party data

- 7 Set out the details of any sharing with third parties, including processors

Intelligent security and Fire Ltd. Will be used to down load data should data for a given date and time be required be required for legal purposes as to reduce the possibilities of corrupted files

Sharing with the police in line with the conditions specified in the School's CCTV policy



- 8 Set out the retention period of any recordings, including why those periods have been chosen**

**30 Days (maximum retention period possible on the CCTV storage device).**

**Period permits investigation of incidents occurring out of school hours which may not be discovered immediately.**

- 9 Set out the security measures in place to ensure that recordings are captured and stored securely**

**CCTV System has limited access**

- 10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?**

- **Data subjects are not aware that images are being recorded**
- **Processing of excessive amounts of personal data**
- **Unauthorised access to the system**
- **Data breach leading to possession of video images**
- **Exposure of data during sharing with third parties**

- 11 What measures are in place to address the risks identified?**

- **Clear signage is installed in relevant**
- **Images are only retained for specific events.**
- **User names and passwords are confidential and access restricted to named individuals. User accounts disabled if a member of staff leaves the school.**
- **Recordings not shared with third parties other than the Police or subsequent to receipt of a court order**

**13 When will this privacy impact assessment be reviewed?**

**At least ANNUALLY (next review November 2023)**

**Additional reviews will be undertaken if**

- **legislation is changed or updated; or**
- **a specific incident identifies the need for review.**

**Approved**

**Date :**