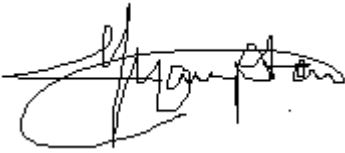




Roman Way Primary School CCTV Policy

Author	HCC
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Reviewed and approved by Governors	
Name	Tanya Hampton
Signed	
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1 Introduction and Scope

Introduction

Roman Way Primary School uses closed circuit television (CCTV) images 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 the loss or damage to school property.

The system comprises a number of fixed and dome cameras.

The system does not have sound recording capability.

The CCTV system is owned and operated by Roman Way Primary School, the deployment of which is determined by the schools leadership team.

The CCTV is monitored centrally from the school offices by an Administrative Officer.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and Roman Way Primary School community.

Roman Way Primary School's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 2018. This policy outlines Roman Way Primary School's use of CCTV and how it complies with the Act.

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 by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

Statement of Intent

Roman Way Primary 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/Detailspecialist_guides/ICO_CCTVFINAL_2301.ashx

2 Responsibilities

The Headteacher is responsible for ensuring that all individuals working (including volunteers) to this policy are suitably trained.

3 Policy Detail

CCTV warning signs will be clearly and prominently placed at all external entrances to the schools, including school gates if coverage includes outdoor areas.

Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, Roman Way Primary School will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The scheme has been planned and designed to ensure that maximum effectiveness and efficiency is achieved but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated. Roman Way Primary School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

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

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

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

Covert Monitoring

Roman Way Primary School may in exceptional circumstances set up covert monitoring. For example:

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

In these circumstances authorisation must be obtained from a member of the Senior Leadership Team (SLT).

Covert monitoring must 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 toilet cubicles.

Storage and Retention of CCTV images

Recorded data will not be retained for 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.

All retained data will be stored securely.

Right to Erasure

Under the **General Data Protection Regulations (GDPR)** individuals have the right to erasure. This means an individual can make a request to the school to erase all the data captured of them through a CCTV camera.

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)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018.

Under **GDPR** all requests can be made either in writing or verbally 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.

Roman Way Primary School will respond to requests within 48 hours of receiving them and will provide data within 1 month of the request.

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.

Access to and Disclosure of Images to Third Parties

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).

Requests should be made 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.

Complaints

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

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) <http://www.ico.gov.uk>

Regulation of Investigatory Powers Act (RIPA) 2000

Data Protection Act 2018

This CCTV system and the images produced by it are controlled by the Data Controlling Officer who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

Roman Way Primary School has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of pupils. It will not be used for other purposes. Roman Way Primary School will conduct an annual review of this CCTV Policy by the date indicated on the front page.

The school will regularly check the CCTV system is working correctly (Once a week).

Signage

The signage at the school will include the following information;
That the area is covered by CCTV surveillance and that images are recorded.

The purpose of using CCTV.

The name of the school.

The contact telephone number, website or email address for enquiries.

4 Associated Documents

Data Controlling Officer

Data Protection Policy 2020

Plans within Roman Way Primary School that indicate the location and coverage of the cameras, are available.

5 Change Control

When a new version is made of this policy, it is the responsibility of the person changing the policy to ensure that the previous electronic version is placed in the archive. They must also replace all paper copies with the new version. If there are changes to any associated forms, the previous version of the form must be replaced with the new version.

All changes made must be recorded on page 1 of the policy in the section marked 'Main changes from previous version'