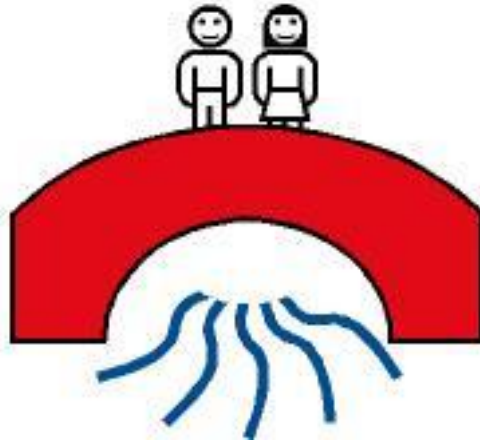


Loddon Primary School



CCTV Policy

Author: Jenny Sumner

Committee responsible: Environment Committee

Date of last review: January 2019

Date of next review: January 2020

Authorised on 23rd January 2019

Sarah Phillips

Headteacher

Sue Ambaum

Committee Chair

1. Introduction and Purpose

- a. The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Loddon Primary School.
- b. The system comprises six fixed dome cameras located around the school site. The system does not have sound recording capability.
- c. The CCTV system is owned and operated by the school. Live camera images are only monitored from the office. Recorded data and remote access is only available to authorised persons.
- d. This policy provides a summary of key points from the Information Commissioner's Office (ICO) CCTV Code of Practice, but the Code itself (available from the ICO website - www.ico.org.uk) can also be consulted, for example:
 - i. So that CCTV authorised users have a wider background understanding of the key issues.
 - ii. Where there is a need for additional detail in specific circumstances.

2. Statement of intent

- a. The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act (Registration No Z9763928) and will seek to comply with or have due regard to relevant requirements and guidance including:
 - i. General Data Protection Regulation (GDPR)
 - ii. Information Commissioner's Office (ICO) CCTV Code of Practice
 - iii. Freedom of Information Act 2000 (FOIA)
 - iv. Human Rights Act 1998 (HRA)
 - v. Surveillance Camera Code of Practice issued under the Protection of Freedoms Act (POFA code).
- b. The governing body has considered the need for using CCTV and have decided it is required in order to provide a safe and secure environment for pupils, staff and visitors, to prevent the loss or damage to property, for the prevention and detection of crime and to assist in the investigation of accidents, incidents and near misses. It will not be used for other purposes.
- c. The potential impact on individuals' privacy has been identified and taken into account in the design and use of the system.
- d. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.
- e. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by GDPR.
- f. Except for law enforcement bodies, images will not be provided to third parties.
- g. Recorded CCTV data will not be kept for longer than is necessary to meet the intended purpose of the system. When data is no longer required it will be securely deleted.

- h. CCTV warning signs, as required by the ICO Code of Practice have been placed at all access routes to areas covered by the school CCTV.
- i. There is no expectation that the CCTV system will be used for covert surveillance and such use is not covered by the ICO Code of Practice or this policy. It would instead be governed by the Regulation of Investigatory Powers Act (RIPA) 2000. If there were exceptional circumstances where it appeared that use of covert CCTV might be appropriate, legal advice would be taken before allowing such an operation to take place. This might be for instance where there is good cause to suspect that illegal or unauthorised actions are taking place, where there are grounds to suspect serious misconduct, or where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

3. Siting the cameras

- a. Cameras are sited in appropriate locations to enable them to be used to monitor activities within the school and its car parks and other public areas. The aim is to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the school, together with its visitors. Cameras have been sited with the aim of providing clear images as far as possible.
- b. Cameras will not be focused on private homes, gardens and other areas of private property.
- c. The planning and design of the CCTV system has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

4. Governance of the CCTV system and procedures

- a. The CCTV Scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in this policy. The day-to-day management will be the responsibility of the Site Manager/School Business Manager.
- b. Recorded CCTV images will only be accessed by members of the Senior Leadership Team, Site Manager and ICT Technician and other persons with appropriate authorisation and knowledge of this policy.
- c. Authorised staff will be trained in the use of the CCTV system, familiar with this policy and will have an awareness of the additional detail in the ICO Code of Practice.
- d. Viewing of live CCTV images on monitors/laptops will be restricted to the school office. Recorded data and remote access is only available to authorised persons.
- e. Access to CCTV systems will be secured using appropriate physical and technical measures.

- f. The Site Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.
- g. There must be approval for others to have access to CCTV systems and a log should identify such individuals and the purpose of the visit (e.g. CCTV technical engineers).
- h. The school will ensure that relevant information about the CCTV system is available to people in accordance with their role. This policy will be available to anyone who visits the school.

5. Complaints and policy breaches

- a. Any breach of the CCTV Scheme will be initially investigated by the Headteacher, in order that the appropriate action can be taken and recommendations made regarding how to avoid reoccurrence.
- b. Any complaints about the school's CCTV Scheme should be addressed in line with the school's usual complaints procedure.

6. Subject Access Requests

- a. Individuals have the right to request access to CCTV footage relating to themselves under GDPR. The school will ensure that nominated individuals are aware of this right and know how to respond to requests in line with legislation.
- b. CCTV footage is usually held for four weeks before being overwritten. Archived images relating to a specific event or investigation may be held for longer periods in line with data retention guidelines.
- c. All data subject requests must be made in writing to the Headteacher. Individuals submitting requests for access will have to provide sufficient information to enable the footage relating to them to be identified and isolated. For example, date, time and location.
- d. The school will respond to requests without undue delay and within the legal timeframes for Subject Access Request, at the latest within one month, of receiving the written request and any fee.
- e. The school reserves the right to charge a fee for images to cover costs as allowed by law.
- f. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.
- g. Further details regarding Subject Access Requests are provided in the ICO Code of Practice and advice can be requested directly from the ICO if required.

7. Review of policy

- a. This Policy will be reviewed annually to ensure the procedures are complied with in practice. This will include confirmation that the use of CCTV remains necessary and that all aspects of the checklist in the Appendix are in place.

Appendix - CCTV Checklist

This checklist is taken from the ICO Code of Practice and will be used as part of our annual review of the use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.			
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, images will not be provided to third parties.			
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the School Business Manager/Head teacher knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			

LODDON PRIMARY SCHOOL

Headteacher: Mrs S Phillips, MA ED (Open)

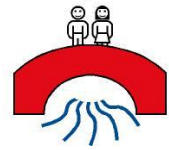
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Loddon
Primary School



Sharing CCTV

Name of Staff Member Sharing CCTV	
Name of Person viewing CCTV	
Reason for CCTV request	
Date and Time of CCTV recording	
CCTV cameras recording on	
Date and Time of CCTV viewing	
Action to be followed up following viewing	

I agree to viewing of the CCTV, in relation to the above date and time only, in line with Loddon Primary School's CCTV Policy:

Name (on behalf of the school)	
Signed	
Name (recipient)	
Signed	