



# **Rudston Primary School**

## **CCTV Policy**

**Date: Autumn 2023**

**This policy and all school policies are produced in accordance to guidance set out in our school legislation and guidance policy.**

**Approved By Governors: 2023**

**Review Autumn Term 2026**

## **Our Mission Statement:**

To develop a love of learning,  
enabling all children  
to reach their full potential.

\* Respect \* Resilience \*  
\* Responsibility \* Enjoyment \*  
\* Challenge \*

## **Safeguarding Statement:** “Rudston

Primary school is committed to  
safeguarding and promoting the welfare of  
children and young people and expects all  
staff and volunteers to share this  
commitment.”

## Purpose

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at our school.

- ☐ The CCTV system is owned by the school.
- ☐ The System comprises a number of fixed cameras located around the school site.
- ☐ All cameras are monitored from the main school office and are monitored by office staff, Site Manager and SLT.
- ☐ This code follows GDPR guidelines.
- ☐ The code of practice will be subject to review to include consultation as appropriate with interested parties.

## Objectives of the CCTV system

The system has been installed by the school with the primary purpose of reducing the threat of crime generally, protecting our premises and helping to ensure the safety of all of our staff, students and visitors whilst being consistent with respect for the individuals' privacy.

- ☐ To increase personal safety of staff, students and visitors and reduce the fear of crime
- ☐ To deter those with criminal intent and protect the school buildings and their assets.
- ☐ To assist in the prevention and detection of crime.
- ☐ To assist in identifying, apprehending and prosecuting offenders.
- ☐ To protect members of the public and private property.
- ☐ To assist in managing the school.
- ☐ Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against other staff or students and assist in providing evidence to managers and/or to a member of staff or student whom disciplinary or other action is, or is threatened to be taken.

The system will not be used:

- ☐ To provide recorded images to the world wide web.
- ☐ To record sound other than in accordance with the policy on covert recording.
- ☐ For any automated decision making.

Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

## Statement of Intent

The CCTV system will be registered with the Information Commissioner under the terms of the General Data Protection Regulation and will seek to comply with both the regulations of GDPR and the Commissioner's Code of Practice.

- ☐ The school will treat the system and all information, documents and recordings obtained and used as data which are protected by GDPR.
- ☐ Camera's will be used to monitor activities within the school and other public areas to identify criminal activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- ☐ Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
- ☐ Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without authorisation being obtained via a specific consent form completed by the subject as set out in the Regulation of Investigatory Power Act 2000.
- ☐ Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime with written authority of the police. Recordings will never be released to the media for the purposes of entertainment.
- ☐ The planning and design has endeavoured to ensure that the system will give maximum effectiveness and efficiency. This is not a guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- ☐ Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.
- ☐ The retention period for these images is 30 days.

## Operation of the system

The system will be managed and administered by the Head teacher or his/her nominee, in accordance with the principles and objectives set out in this code.

The day-to-day management will be both the responsibility of the Head teacher, School Business Manager, Site Manager and Ultra Security.

The CCTV controls and hardware devices will only be accessed by the Head teacher, School Business Manager, Site Manager and Ultra Security.

The CCTV system will be operated 24 hours a day, 365 days of the year.

## Controls and Hardware

- ☐ The Site Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- ☐ Access to the CCTV controls and hardware devices will be strictly limited to the Site Manager, Head teacher, SBM & Ultra Security.
- ☐ Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- ☐ Visitors and other contractors wishing to access the CCTV system will be subject to a particular arrangement as outlined below.
- ☐ CCTV operators must satisfy themselves over the identity of any visitors and other contractors wishing to access the CCTV system and the purpose of the visit. Where any doubt exists access will be refused. Details of all visitors and visits are endorsed on the school signing in system.
- ☐ It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors must first obtain permission from the Site Manager, School Business Manager or Head teacher and must be accompanied throughout the visit.
- ☐ Any visit may immediately be curtailed if prevailing operational requirements make this necessary.
- ☐ If out of hours emergency maintenance arises, the school must be satisfied of the identity and purpose of the contractors before allowing entry.

- ☒ All visitors must use the signing in system in the main reception. Full details of visitors including time, date and an image will be recorded.
- ☒ Other administrative functions will include maintaining the drive, filing and maintaining occurrence and system maintenance logs.
- ☒ Emergency procedures will be used in appropriate cases to call the Emergency Services.

### Monitoring Procedures

Camera surveillance may be maintained at all times. Monitors are installed in the main school office and infant Building reprographics room to which pictures will be continuously recorded. If covert surveillance is planned or has taken place, copies of authorisation forms, including any review or cancellation must be returned to the School Business Manager.

### Image storage procedures

In order to maintain and preserve the integrity of any recordings used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- (i) Each disc/device produced from the hard drive must be identified by a unique mark or verification code.
  - (ii) Before use, each disc/device must be cleared of any previous recording.
  - (iii) The controller shall register the date and time of the disc/device insert, including the disk/device reference.
  - (iv) A disc/device required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence suitable store. If a disc/device is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the controller, dated and returned to the evidence store.
  - (v) If the disc/device is archived the reference must be noted.
- ☒ Recordings may be viewed by the police for the prevention and detection of crime.
  - ☒ A record will be maintained of the release of discs/devices to the Police or other authorised applicants. A register will be available for this purpose.
  - ☒ Viewing of discs/devices by the Police must be recorded in a log book. A request from the police for this data must ensure that when providing data it will meet the following criteria from S15 clause (2.1):
    - Will be for the prevention or detection of crime
    - The prevention or prosecution of defendants.
  - ☒ Should a disc/device be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. Discs/devices will only be released to the Police on the clear understanding that the disc/device remains the property of the school and both the disc/device and the information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the disc/device or any part of the information contained thereon. On occasions when a court requires the release of an original disc/device this will be produced from the secure evidence store, complete in its sealed bag.
  - ☒ The Police may require the school to retain the stored discs/devices for possible use as evidence in the future. Such discs/devices will be properly indexed and properly and securely stored until they are needed by the Police.
  - ☒ Applications received from outside bodies (e.g. solicitors) to view or release discs/devices will be referred to the Head teacher. In these circumstances discs/devices will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order. A fee cannot be charged.

### **Breaches of the code (including breaches of security)**

Any breach of the Code of Practice by school staff will initially be investigated by the Head teacher, in order for her to take the appropriate disciplinary action. Any serious breach of the code of practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

### **Retention Period**

CCTV images will be kept for a maximum of 33 days

(Old System DVR Recorder - Junior Building, Canteen and Car Park - 13 days storage)

(New System DVR Recorder - Infant Building, Children's Centre & Car Park - 33 days storage)

Should an event take place which meant a record of these images had been requested, we would keep a copy of the images for 6 years following the year of request.

The images would be stored on a disk/device and kept in the school safe.

### **Assessment of the scheme and code of practice**

Performance monitoring, including random operating checks, may be carried out by the Site Manager, Head teacher or School Business Manager.

### **Complaints**

Any complaint about the schools' CCTV system should be addressed to the Head teacher. Complaints will be investigated in accordance with the schools' complaints procedure/policy.

### **Access by the Data Subject**

The GDPR provides Data subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Request for obtaining this information must be done in the form of a 'Subject Access Request'. This request should be directed to the schools Data Protection Officer.

### **Public Information**

Copies of this policy are available to the general public from the main school office on request or from the school website.

Agreed Governors : Autumn 2023

Review Date: Autumn 2026