

Sackville School

Closed Circuit Television (CCTV) Policy

1 Definitions

- 1.1 This policy includes several technical expressions, which are defined below:
- “CCTV” means the school’s closed-circuit television system, referred-to in this policy as, “the System”;
 - “ICO” means the Information Commissioner’s Office which is the UK’s independent authority set up to uphold information rights in the public interest and to promote openness by public bodies and data privacy for individuals;
 - “DPA” means Data Protection Act 1998;
 - “GDPR” means the General Data Protection Regulation which puts into law the general data protection regime that applies to most UK businesses and organisations, including schools;
 - “Data Controller” is the person legally responsible for the school’s compliance with the DPA and GDPR, and is responsible for ensuring that data handled by the school is, and remains, protected. The Data Controller is also the person notified to the ICO as the school’s Data Protection Officer and is the named individual responsible for the operation of the System;
 - “SLT” means the group of staff who make up the school’s Senior Leadership Team and includes the Head Teacher;
 - “Designated Staff” are a limited number of school employees who have been individually selected by the SLT to be responsible for maintaining and operating the CCTV System under the supervision of the school’s Data Controller;
 - “CCTV Code of Practice” means the CCTV code of practice published by the ICO at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

2 Introduction

- 2.1 Sackville School has considered the need for using CCTV and decided it is required for the prevention and detection of crime and for protecting the safety of the school’s community.
- 2.2 The System has been chosen to produce clear images suitable for law enforcement bodies (usually the Police) to help them investigate crime. These images can be taken from the System easily after their removal has been duly authorised as per paragraphs 6 and 8 of this policy.
- 2.3 The System and its derived images shall be operated for the following purposes:
- Ensuring the wellbeing of individuals on the school site
 - Protecting the school buildings and assets
 - Protecting the personal property of students, staff and visitors to the school
 - Supporting the Police in their duties, including identifying, apprehending and prosecuting offenders
 - Prevention or detection of crime
 - Safeguarding of staff, pupils and visitors
- 2.4 The System equipment:
- was installed, and is maintained, by Bespoke Security Sussex Limited
 - is owned and operated by Sackville School
 - comprises a number of fixed-dome and tilt-and-zoom cameras to provide clear images
 - does not have any sound recording capability
 - is monitored from the offices of the Designated Staff and the Data Controller only



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- 2.5 The introduction of, or changes to, CCTV monitoring is subject to consultation with staff and members of the school community.
- 2.6 The deployment of the System is determined by the SLT.
- 2.7 The school's Business Manager is the named individual who is responsible for the daily operation and control of the System and assigned the role of Data Controller accordingly.
- 2.8 Acts of accessing and processing live and recorded images are controlled by the Data Controller and approved by the SLT.
- 2.9 The System is registered with the Information Commissioner under the terms of the DPA and GDPR. The use of CCTV is covered by the DPA. This policy outlines the school's use of CCTV and how it complies with the DPA and GDPR.
- 2.10 The school shall notify the Information Commissioner about the System, including any modifications of use and/or its purpose, which is a legal requirement of the current DPA.
- 2.11 The school's Designated Staff and the Data Controller will have access to live and recorded images and will be made aware of the procedures that need to be followed when gaining access to them. Through this policy, they will be made aware of their responsibilities in following the ICO's CCTV Code of Practice.
- 2.12 By the publication and promulgation of this policy, the school will ensure that all its staff are made aware of the legal restrictions in gaining access to, processing and disclosing, recorded images.

3 Statement of Intent

- 3.1 The school intends to comply with the ICO's CCTV Code of Practice to ensure that the System is used responsibly and safeguards both trust and confidence in its continued use.
- 3.2 Signs indicating that CCTV is in operation are placed clearly and prominently around the school.
- 3.3 The planning, design, installation and upgrade of CCTV equipment endeavours to ensure that the System delivers maximum effectiveness and efficiency in its intended purpose. However, it is not possible to guarantee that the System will detect or record every single incident that may take place in the areas of coverage.

4 Siting of Cameras

- 4.1 Cameras will be sited so that they only capture images relevant to the purposes for which they are installed (see introduction) and care will be taken to ensure that reasonable privacy expectations are not violated.
- 4.2 The location of equipment will be carefully considered to ensure that images captured comply with the requirements of GDPR and the DPA.



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- 4.3 Every effort will be made to position cameras so that their coverage is restricted to only the indoor and outdoor areas of the school premises and to avoid capturing the images of people not visiting the school.
- 4.4 Cameras will not be installed in or cover classrooms but will be placed in limited areas within the school building that have been identified by the SLT as areas that need monitoring.
- 4.5 Members of staff will have access to details of where CCTV cameras are situated.

5 Storage and Retention of CCTV images

- 5.1 Retained data will be stored securely at all times and, unless required for the intended purposes of the System, deleted permanently after 24 days.
- 5.2 In cases where recorded images need to be retained for more than 24 days to fulfil the intended purposes of the System, they will be kept no longer than the minimum time necessary.
- 5.3 While retained, the integrity and security of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

6 Access to CCTV images

- 6.1 The System and the images produced by it are controlled by the Data Controller.
- 6.2 Access to live or recorded images are restricted to Designated Staff and the Data Controller.
- 6.3 If access is requested by an outside authority to support a formal investigation, it shall only be provided after a formal request has been submitted to the school by that authority and approved for release by the SLT under the terms of this policy.
- 6.4 Designated Staff and the Data Controller shall be required to sign the School CCTV Operators' Agreement which describes their legal duties and responsibilities in recording and processing personal data.

7 Subject Access Request (SAR)

- 7.1 Individuals have the right to request access to CCTV recordings relating to themselves under the DPA and GDPR.
- 7.2 All requests for access to recordings should be made in writing, addressed to the Headteacher as Subject Access Requests, and include sufficient information to enable those parts of recordings relating to individuals to be identified accurately, for example, by date, time and location.
- 7.3 A fee of £10 may be charged for each submitted SAR as per the ICO CCTV Code of Practice.
- 7.4 The school will respond to SARs within 40 calendar days of receiving the written request and any applicable fee. This is as per the ICO CCTV Code of Practice.



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- 7.5 The school reserves the right to refuse access to CCTV recordings where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8 Access to and Disclosure of Images to Third Parties

- 8.1 There will be no disclosure of recorded data to third parties other than to authorities such as the Police and service providers to the school (e.g. investigators) where these authorities and service providers seek reasonable access to the data to carry out their legal responsibilities and have complied with this CCTV policy.
- 8.2 Recorded data may be used reasonably and appropriately to support investigations arising from the school's discipline and grievance procedures, and will be subject to the usual confidentiality requirements of those procedures.

9 Complaints

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

10 Further Information

- 10.1 Further information on CCTV and its use is available from the following sources:
- CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office) Version 1.2 www.ico.org.uk
 - Regulation of Investigatory Powers Act (RIPA) 2000
 - Data Protection Act 1998
 - General Data Protection Regulation

11 System Audits

- 11.1 The System equipment and its functioning will be inspected annually in accordance with the school's internal audit schedule.
- 11.2 The use of the System will be reviewed by the SLT on a regular basis to ensure its continuing compliance with applicable regulations, its effectiveness and the fulfilment of its intended purpose. The results of such system reviews will be reported to the next appropriate meeting of the school Governing Body.