



BEVERLEY SCHOOL FOR PUPILS WITH AUTISM

CCTV Policy

Updated: February 2021
Approved by Governors: March 2021
To be reviewed: January 2023

Beverley School CCTV Policy

Policy Statement

Beverley School uses Close Circuit Television (CCTV) within its school's grounds and buildings. The purpose of this policy is to set out the position of the school as to the management, operation and use of the CCTV.

This policy applies to all members of our Workforce, visitors to the school and all other persons whose images may be captured by the CCTV system. The policy takes account of all applicable legislation and guidance, including:-

- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- CCTV Code of Practice published by the Information Commissioner
- Human Rights Act 1998

Purpose of CCTV

Beverley School uses CCTV images:

- To provide a safe and secure environment for pupils, staff and visitors
- To prevent the loss or damage to school property
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

Description of System

The system comprises a number of fixed cameras and the system does not have sound recording capability.

Siting of Cameras

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.

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. Beverley School will make all reasonable efforts to ensure that areas outside of the school's premises are not recorded.

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

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

Privacy Impact Assessment

Prior to the introduction of, or changes to, CCTV monitoring, a privacy impact assessment will be conducted by the Senior Leadership Team to ensure that the proposed changes are compliant with legislation and ICO (Information Commissioner's Office) guidance.

Beverley School will adopt a privacy by design approach when installing new cameras and system, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

Management and Access

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

On a day to day basis, the CCTV is monitored centrally from the school offices by the Administrative Assistants, Joanne Newell, Kylie Reay and Mary Blackburn, and the Data Controlling Officer, Katy Hall.

The viewing of live CCTV images will be restricted to the office staff above, members of the Senior Leadership Team, and the school's Data Protection Officer (DPO) for the reasons set out above. 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.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

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 – currently within the Admin drive where only the staff identified above, including Senior Leaders, can access.

Subject Access Requests (SAR)

Any individual recorded in any CCTV image is a data subject under the rules of GDPR and, as such, has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to Data Protection legislation. Such a request should be considered in the context of Beverley School's Data Protection Policy and Data Protection Code of Practice.

When such a request is made, the school's DPO or member of the Senior Leadership Team will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

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. The DPO or Senior Leader must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals, then the School must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, e.g. whether the images can be distorted so as not to identify other individuals
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request
- If unsure, School should contact the ICO and seek advice

All requests should be made in writing to the School's Data Protection Officer. 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.

In line with GDPR, the school will respond to requests within one month of receiving the written 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.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made
- The process followed by the DPO in determining whether the images contained third parties
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when
- Whether a copy of the images was provided and, if so, to whom, when and in what format

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).

If a request is received from a law enforcement agency for disclosure of CCTV images, the Headteacher / DPO must follow the same process as above in relation 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 third party images.

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 Headteacher / DPO should contact the ICO in the first instance and appropriate legal advice may be required.

Misuse of CCTV Systems

The misuse of the CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

Complaints relating to this Policy

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)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018