The Chalfonts Community College

*Success is an Attitude!*

# CCTV Policy

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## 1. Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

### 1.1 Statement of Intent

- The purpose of the CCTV system is to:
- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Monitor behaviour and provide evidence of incidents to support process in line with behaviour policies
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings
- The CCTV system will not be used to:
- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms)
- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

## 2. Relevant legislation and guidance

This policy is based on:

### 2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998

- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

**2.2 Guidance**

- Surveillance Camera Code of Practice (2021)

## 3. Definitions

Surveillance: the act of watching a person or a place.
CCTV: closed circuit television; video cameras used for surveillance.
Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance.

## 4. Covert surveillance

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

Additionally, the proper authorisation forms from the Home Office will be completed and retained where necessary.

## 5. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

The location of the cameras can be accessed through either the Hikvision or Verkada systems
Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance.

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.
Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

## 6. Roles and responsibilities

**6.1 The governing board**

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

**6.2 The Principal**

The Principal will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Sign off on any expansion or upgrading to the CCTV system
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties
- The Principal may delegate some or all of these responsibilities to the Director of Finance and Operations

**6.3 The system manager**

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws

Ensure the data and time stamps are accurate

## 7. Operation of the CCTV system

The CCTV system will be operational 24 hours a day, 365 days a year.
Recordings will have date and time stamps. This will be checked by the system manager

## 8. Storage of CCTV footage

Footage will be retained for (HikVision 14 Days, Verkada 30 days). At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

## 9. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

**9.1 Staff access**

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

Any member of staff who misuses the surveillance system may be committing a criminal offence and will face disciplinary action.

**9.2 Subject access requests (SAR)**

According to UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving the subject access request the school will immediately issue a receipt and will then respond within 1 calendar month.

All staff have received training to recognise SARs. When a SAR is received staff should inform the DPO in writing. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

On occasion, the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

**9.3 Third-party access**

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the Principal and the DPO.
The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose, and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with UK GDPR.

All disclosures will be recorded by the DPO.

## 10. Data protection impact assessment (DPIA)

The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

## 11. Security

- The system manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked periodically for faults
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

## 12. Complaints

Complaints should be directed to the Principal or the DPO and should be made according to the school's complaints policy.

## 13. Monitoring

The policy will be reviewed annually to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

## 14. Links to other policies

- Data protection policy
- Biometric data policy
- Privacy notices for parents, pupils, staff, governors and suppliers
- Safeguarding policy

## History

| Date | Issue | Status | Comments |
|---|---|---|---|
| October 2022 | 1 | New | |
| January 2025 | 2 | Rewritten | |