Blaenavon Heritage VC School

CCTV Policy

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DOCUMENT CONTROL

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REVISION HISTORY

Issue Date	Version / Status	Reason for Change	Changed By:
Jan 2022	1.0 Live	Policy Implementation/changes	AP
		Changes made to the following …… due to legislation change/process change/audit recommendation	
April 2023	2.0 Live	Review and additions to point 2 and point 3 regarding investigating incidents captured on footage	AP
June 2024		Update to servicing of system added	Julian Smith

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PURPOSE

We take responsibility towards the safety of staff, visitors, pupils and the school property very seriously. To this end we use CCTV as part of our safeguarding to monitor our property and persons attending the school.

- The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at BHVC School, hereafter referred to as 'the school'.
- The system comprises of a total of 39 fixed cameras which are located at the main entrance and common areas of the school. Cameras are NOT located in any areas such as toilets, changing rooms or staff rooms
- The CCTV system is owned, monitored and maintained by the school and images from the system are only viewed within the CCTV/Comms room on level 2. Images are only available to selected senior staff.

- The system was installed by AVA on behalf of the school and we have a maintenance contract with them.

1. SCOPE

This policy applies to all CCTV records created, maintained and held in all formats by the School and applies to:

- Governors, all employees, whether office based or working via remote access, including contractors, pupils, visitors, volunteers, agencies and partner organisations operating on behalf of the school.

2. AIMS & OBJECTIVES

Objectives of the CCTV scheme are:

- To protect pupils and staff in the school
- To protect the school buildings and their assets
- To deter potential criminal offenders and acts
- To increase personal safety and reduce the fear of crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and visitors and private property
- To assist in managing the school
- To assist in the investigation of incidents within the school which may be captured on CCTV footage

Aims of the CCTV scheme are:

- The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Data Protection Law (UK GDPR and DPA2018).

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- Cameras will be used to monitor activities within the school, the grounds and other public areas for the prevention and detection of crime and for the purpose of securing the safety and well-being of the school pupils and staff, together with its visitors.
- Cameras shall usually be sited in communal areas such as corridors or entrances. They shall not be sited in areas where there is a heightened expectation of privacy such as offices, changing rooms or toilets.
- The system does not employ audio recordings, high-definition cameras, facial recognition software or automatic number plate recognition software
- The system captures moving image, still image and vehicle details
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- If CCTV footage has captured incidents copies will only be released for use in the investigation on receipt of signed paperwork if entitled under Data Protection or other UK legislation.
- As part of an internal school investigation footage can be released to the governing body investigatory panel
- If requested by the Police the date, time, location, and incident for which CCTV recordings are requested should be specified on a Disclosure Request Form signed by an officer of the rank of inspector or above.
- On occasions when a Court requires the release of an original recording, this will be provided by the school on receipt of signed paperwork.
- Copies of incidents will never be released to the media for purposes of entertainment.
- Under data protection legislation, individuals have the right to make a Right of Access Request know as a 'Subject Access Request' to gain access to CCTV images of themselves and be provided with a copy subject to certain criteria. A log of all requests will be kept by the school and the DP department. To make a request for CCTV images contact the Headteacher. If the footage contains only the individual making the request, then the individual may be permitted to view the footage.
    - Where footage contains images of other individuals, advice should be sought from the Data Protection Officer and the school must consider:
        I. Whether the request requires the disclosure of others or can the images be distorted so as not to identify them
        II. Whether the other individuals have consented to the disclosure of the images,
        III. Where consent is not sought or obtained, whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
        IV. A log must be kept of all disclosures
- The school has endeavoured to ensure that the CCTV system planning and siting of cameras 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.
- Information signs, as required by the Surveillance Camera Code of Practice shall be placed at main entrances and where the cameras are sited to inform individuals that CCTV is in operation in that area.

- As a school we comply with the 12 guiding principles of the Surveillance Camera Commissioners Code – see link Code of practice - A guide to the 12 principles (publishing.service.gov.uk)

- Surveillance Camera Code of Practice (publishing.service.gov.uk)

- The data captured will be stored on hard disc drive and held for 21 days before being automatically erased. Images captured can be downloaded onto a portable disc/USB which must be encrypted once the correct paperwork has been received.

3. RESPONSIBILITIES

The following individuals/groups have specific responsibilities:

Headteacher	policy formulation, review, implementation, and governance
Governors/Headteacher	monitor/promote compliance of this policy and report back via Governor meetings.
Governor panels	View footage where it is necessary to manage the school processes
Data Protection and Information Governance Team	provide support and advice
Senior School Staff/Facilities Manager/School Clerk	monitor the CCTV, ensuring compliance with relevant national and local security standards. Ensure that Policies & Procedural documents are made known to all staff, inclusive of agency workers, contractors, volunteers, students or anyone accessing the Council's systems or information The CCTV system will be administered and managed by the Facilities Manager who will check and confirm the efficiency of the system weekly and, in particular, check that the equipment is properly recording and that cameras are functional. System serviced in August 2024 by AVA, who installed system and service it annually. Access to the CCTV Controls will be strictly limited to nominated staff. The system is password protected and the images securely stored. When reviewing any incidents, no one other than personnel authorised by the Head should be present when reviewing any CCTV footage. The CCTV system will be operated 24 hours each day, every day of the year and images retained for 21 days unless there has

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	been a request for the images beforehand and only be used for the purposes for which it is intended, including supporting public safety, the protection of pupil, staff and volunteers and law enforcement
All staff and Governors	Should read and follow the Policy & Procedural guidance as well as undertaking any training/awareness provided. All staff are aware of the rights of the individual under GDPR regulations and how to invoke these rights. These are: The right to be informed The right of access The right to rectification The right of erasure The right to restrict processing The right to data portability The right to object Rights in relation to automated decision making and profiling.

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4. LEGISLATION & KEY REFERENCE DOCUMENTS

(Please note this list is not exhaustive)

The Council will abide by all relevant UK legislation and the following policies and procedures:

- UK GDPR (General Data Protection Regulation)
- The Data Protection Act (2018)
- ICO CCTV code of Practice
- Freedom of Information Act 2000
- Protection of Freedoms Act 2012
- Human rights Act 1998
- Surveillance Camera Code of Practice
- The Regulation of Investigatory Powers Act 2000

SCHOOL POLICIES

- Data Protection Policy
- Acceptable Use Policy

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- Information Security Policy
- Information Sharing Policy
- Retention Policy
- Secure Destruction Policy
- Information Access Policy
- Information/Data Loss Policy
- Requests for Information Policy
- FOI Policy

TCBC PROCEDURES

- Data Protection Procedures
- Requests for Information Procedures
- Retention Schedule
- Acceptable Use Procedures

5. MONITORING AND REVIEW

The Head Teacher together with the board of governors will monitor the implementation of this policy.

This policy will be subject to review when any of the following conditions are met:

- Content errors or omissions are highlighted.
- Where another standard/guidance issued conflicts with the information in this policy.
- An initial 1 year review from policy implementation and on a 3 yearly basis from the current version approval date.

6. COMPLIANCE

Failure to comply with this Policy could result in disciplinary action resulting in termination of employment and in serious cases individuals being prosecuted under the Data Protection Law.

The school is its own Data Controller and the CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 2018. It will seek to comply with the requirements both of the Data Protection Act and the Surveillance Commissioner's Code of Practice. If you have any complaints or would like to exercise any of the GDPR rights above you should contact:

The Head teacher
Blaenavon Heritage VC Primary School
Middle Coed Cae Road
Blaenavon
Torfaen. NP4 9AW

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You may also contact the Information Commissioner (ICO) at:

The Information Commissioner's Office (Wales): The Information Commissioner's Office (Wales), 2nd Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH. Telephone 0330 414 6421 e-mail Wales@ico.org.uk

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