



Closed Circuit Television (CCTV) Policy

February 2021

Introduction

North Huddersfield Trust School uses closed circuit television (CCTV) images to safeguard staff and students, reduce crime and monitor school operation and buildings in order to provide a safe and secure environment for students, staff and visitors, and to prevent the loss or damage to school property.

The system comprises of a number of fixed and dome cameras inside and outside of the school buildings.

The system does not* have sound recording capability.

The CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher.

The CCTV is monitored centrally from the Network Manager's office.

The school's CCTV Scheme is registered with the Information Commissioner under the terms of GDPR and the Data Protection Act 2018. The use of CCTV and the associated images is covered under GDPR and the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

The Headteacher and Network Manager and IT Technician are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Breaches of the code of practice by staff may lead to disciplinary action and possible criminal proceedings.

1. Statement of Intent

The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

CCTV warning signs are clearly and prominently placed, including at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

CCTV is included in the school's privacy notice on the school website to be transparent to parents and students about the collection of CCTV images.

The planning and design has endeavoured to ensure that the Scheme 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.

2. Siting the Cameras

Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care is taken to ensure that reasonable privacy expectations are not violated. The

school will ensure that the location of equipment is carefully considered to ensure that images captured comply with GDPR and the Data Protection Act 2018.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will not generally be used in classrooms with the exception of any isolation units and, for security purposes, ICT and other classrooms where there are high value items.

Members of staff should have access to details of where CCTV cameras are situated. See Appendix.

3. Covert Monitoring

The school may, in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording;

In these circumstances authorisation must be obtained from a member of the senior management team.

- Covert monitoring must cease following completion of an investigation.
- Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

4. Storage and Retention of CCTV images

Recorded data will not be retained for longer than is necessary, and will usually be deleted after a maximum of 14 days unless it is recognised that it is needed for the purpose of an investigation, in which case it is retained until completion of that investigation. 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. When the retention period has passed, the data will be removed or erased and documented.

5. Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available, unless authorised and documented by the Headteacher, stating the reason for the authorisation. This will be recorded by a member of the IT team on the school's central CCTV access log which has restricted access to IT staff, Business Manager, Premises Manager, Headteacher and Deputy Headteacher. It is important to note that when conducting any investigation, relevant CCTV footage will form only part of the fact finding. Other methods of information gathering will be used as appropriate and in line with school policy.

At North Huddersfield Trust School the following staff have authorisation to access CCTV images only with good reason to do so; these staff have received appropriate training and been issued with the school's CCTV policy:

Network Manager
IT Technician
Headteacher
Deputy Headteacher
Assistant Headteacher (Behaviour)

Other members of staff such as Assistant Headteachers and Pastoral Managers may be required to view CCTV footage and this would be with the assistance of one of the above members of staff.

6. Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under GDPR and the Data Protection Act 2018.

All requests should be made in writing to the Headteacher. 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. All requests and action to be recorded on the school's CCTV log by the Network Manager, stored centrally and with restricted access.

The school will normally respond to any requests within one month.

If you have made a number of requests or your request is complex, we may need extra time to consider your request and we can take up to an extra two months to respond.

If we are going to do this, the school will let you know within one month that we need more time and why.

In most circumstances, the school will provide this information free of charge, however if we feel your request is manifestly unfounded or excessive a charge will be applied.

They can also charge a fee if you ask for further copies of your information following a request.

School can charge a fee, the one-month time limit does not begin until they have received the fee.

All requests will be documented, including whom the request was from, the response received and date of response. This is saved within the school's GDPR logs with restricted access.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation. Refusals are also recorded on the central log by the Network Manager.

7. Access to and 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).

Requests should be made in writing to the Headteacher. Requests should provide the following information:

- Details of requester (name, contact details)
- Information required (dates, locations, people)
- Reason for request
- GDPR compliance

Wherever possible the requester will be invited into school to view the footage however where this is not appropriate (e.g. where the information is required for a legal process), footage may be provided to a third party provided that they have satisfied the Headteacher of their compliance with GDPR and use / disposal of the information in writing. Where this is the case, the data must be encrypted with passwords sent under separate cover. This record will be stored by the Network Manager as part of the school's central log.

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

The data may also be used and shown to students and/or parents as appropriate, in relation to student disciplinary and/or suspension processes and parental complaints.

8. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance and the Chair of Governors where appropriate.

9. Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice 2017 (published by the Information Commissioners Office)
- Regulation of Investigatory Powers Act (RIPA) 2000
- GDPR Data Protection Act 2018

Appendix A – ICO Checklist (from ICO Code of Practice)

This CCTV system and the images produced by it are controlled by the school's Headteacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose, a legal requirement under GDPR and the Data Protection Act 2018.

The school has considered the need for using CCTV and has decided it is required for the prevention and detection of crime, for monitoring school operation and protecting the safety and wellbeing of staff, students and visitors. The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
School privacy notices cover CCTV in adherence with Articles 6 and 9 of GDPR legislation	In progress (Jan21)	Frog Champion	Jan 2022
There is a named individual who is responsible for the operation of the system.	Jan 2021	Network Manager	Jan 2022
Staff named as CCTV authorised users have received appropriate training and received a copy of the school's CCTV Policy	In progress (Jan21)	Business Manager	
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Jan 2021	Network Manager	Aut 2021
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.	Inherited system	n/a	n/a
Cameras have been sited so that they provide clear images.	Jan 2021	Network Manager	Jan 2022
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Jan 2021	Network Manager	Jan 2022
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	In progress (Jan21)	Premises Manager	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Jan 2021	Network Manager	Jan 2022
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Jan 2021	Network Manager	Jan 2022
Except for law enforcement bodies, images will not be provided to third parties.	Jan 2021	Headteacher	Jan 2022
The organisation knows how to respond to individuals making requests for copies of their	Jan 2021	Headteacher	Jan 2022

own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Jan 2021	Network Manager	Ongoing

Appendix B – CCTV Signage

It is a requirement under GDPR and the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries



Appendix C – GDPR & Data Protection Act 2018

GDPR and the Data Protection Act 2018 principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles, for further information refer to [GDPR and the Data Protection Act 2018](#)

Appendix D – CCTV site map

