|  |
| --- |
| **Dale Community** **Primary School****CCTV Policy** |



**Head Teacher: Louise Foster**

**Chair of Governors: Russell Langley**

**Policy Approved by: Governors Behaviour and Safety Committee**

Policy reviewed by: Behaviour and Safety Date: 22 June 2020

 Committee

Policy reviewed by: Behaviour and Safety Date: 28 September 2021

 Committee

Policy reviewed by: Behaviour and Safety Date: 26 September 2023

 Committee

Policy reviewed by: Behaviour and Safety Date:

 Committee

Dale Community Primary School and Stonehill Nursery School, uses closed-circuit television (CCTV), in order to protect the safety of students, staff, parents/carers and visitors. This policy outlines how we use CCTV, in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

##

## Purpose

The CCTV recordings may be used for:

* prevention and detection of crimes, around and on the school and nursery premises
* student behaviour management, discipline, and exclusions
* staff disciplinary and associated processes and appeals
* maintaining a safe environment for the whole school community

## CCTV system operation

* The CCTV system will be operational 24 hours a day, 365 days a year.
* The Data Controller is registered with the Information Commissioner’s Office.
* The system does not record audio.
* All recordings will have date and time stamps.

## Location of cameras

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system. Appropriate signs are displayed around the school and nursery premises, within prominent locations that clearly identifies that CCTV recording is in operation. Cameras are located:

* Two on the entrance on Belvoir Street
* One on the Meynall Street gates
* One on the Foundation Stage entrance gates
* One on the playground
* One in the entrance hall
* One in front office
* One at the back of kitchen
* One between new block and old block (corridor from the staff room to Year 6)

## General access to CCTV footage

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998. In appropriate circumstances, the school or nursery may allow authorised personnel to view footage where the above [*purposes*](#_Purpose)are considered.

* The school and nursery will maintain a record of all disclosures.
* All requests for access should made in writing to the Head Teacher, Louise Foster and be specific to a date and time frame.
* Any disclosure will be done in line with UK GDPR and Data Protection.
* The school or nursery cannot guarantee disclosure of footage when made under a Subject Access Request due to:
* Lack of technical resources available in order to blur or redact the footage.
* The release of footage would prejudice an ongoing investigation.
* Other identifiable individuals have not consented.

## Authorised CCTV system operators

The school and nursery have limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system.

Authorised personnel within school and Nursery are:

* Louise Foster, Headteacher and system manager
* Chris Pass, School Business Manager
* Darren Meakin, Site Manager

The Site Manager and IT Manager are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system. Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the Site or IT Managers once the Head Teacher has given permission to do so.

## Storage and retention of footage

Footage will be retained for no longer than necessary to achieve the system [*purposes*](#_Purpose)*.*

The retention period will be 28 days. Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

On occasion footage may be retained for longer, for example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

## CCTV system security

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary, and proportionate. The system will be safeguarded using the following:

* the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance, and training of authorised personnel.
* the system will be check for faults each week.
* the footage will be stored securely and encrypted.
* the software updates will be installed as soon as possible.
* the recorded footage will be password protected.
* the equipment will be stored in a secured lockable enclosure, accessible only to authorised personnel.
* adequate cyber security measures will be in place to protect footage from attacks.
* a register of authorised staff is maintained, reviewed, and updated when necessary.

## Covert recording

The school and nursery will only *covert record* when the following criteria are met:

* an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective.
* there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
* covert processing is carried out for limited and reasonable period and related to specific suspected criminal activity.
* If the situation arises where the school or nursery adopts *covert recording*, there will be a clearly documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals.

## Complaints

Any complaints should be made in writing to the system manager:

* Louise Foster, Head Teacher. Email address: head@dale.derby.sch.uk

## Review and monitoring

Appropriate changes will be made accordingly in line with changes to legislation.

The headteacher will communicate changes to all authorised staff members.

Scheduled review date annually in September.

## *Lawful Usage*

## *There are two important points within the CCTV Code of Practice 2008 that are basic points of law, which must be adhered to:*

1. *CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located at the entrance gate, the building entrance and inside reception.*

##  *The CCTV system is registered with the Information Commissioners office.*

*Processing Data relates to:*

* *Collection, recording, organisation, structuring or storage.*
* *Adaptation or alteration.*
* *Retrieval, consultation or use.*
* *Disclosure by transmission, dissemination or otherwise making available.*
* *Alignment or combination.*
* *Restriction, erasure or destruction.*

*The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities. The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.*