

CCTV Policy

Introduction

- Epinay School uses closed circuit television (CCTV) images to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.
- The system comprises of a number of dome cameras managed by the school.
- The system does not have sound recording capability.
- There are 3 cameras in place at the school.
- The school's CCTV system is monitored centrally from the school office and Sandra Stephenson is responsible for the monitoring of the CCTV.
- The introduction of any changes to CCTV monitoring will be subject to consultation with staff and the school community.
- All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound (if applicable). All school 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.
- The school's CCTV information is logged in accordance with the school's GDPR personal data ecosystem.

Statement of Intent

- The school complies with the Information Commissioner's Office (ICO) CCTV guidance to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
<https://ico.org.uk/your-data-matters/cctv/>
- CCTV warning signs are clearly placed around the school.
- The planning and design has endeavoured to ensure that our CCTV 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.

Siting the Cameras

- Cameras are sited so they only capture images relevant to the purposes for which they are installed, and care will be 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.
- Members of staff should have access to details of where CCTV cameras are situated, except for cameras placed for the purpose of covert monitoring.

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 leadership team. Advice will also be sought from our Data Protection Officer.
- 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.

Storage and Retention of CCTV images

- Recorded data will not be retained for longer than is necessary. All images will be kept on the school site and will be overwritten every 90 days unless they are required for an ongoing 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.

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.

Subject Access Requests and Freedom of Information Requests

- Individuals have the right to request access to CCTV footage relating to themselves under GDPR and the Data Protection Act 2018.
- All requests are covered by the school Subject Access Request Policy and this can be provided on 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 ongoing investigation.
- CCTV is covered by the Freedom of Information Act 2000.

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).
- The school will never disclose CCTV images to the media or place CCTV images on the Internet.
- Requests should be made as described above.
- 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.

Complaints

- Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher in the first instance.

Policy approved by Governors: Nov 2020

Date of next review by Governors: Nov 2021