

**SHENFIELD
HIGH SCHOOL**



**School Closed
Circuit Television
(CCTV) Policy**

Ratified by the Governing Body on:

May 2020

1. Introduction

- 1.1 Shenfield High School uses closed circuit television (CCTV) images to reduce crime and 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.
- 1.2 The system comprises of a number of fixed and dome cameras.
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.
- 1.5 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

2. Statement of Intent

- 2.1 The school complies with 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. The Code of Practice is published at:

<https://ico.org.uk/~media/1542/cctv-code-of-practice.pdf>

- 2.2 CCTV warning signs will be clearly and prominently placed around the school.
- 2.3 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.

3. Siting the Cameras

- 3.1 Cameras will be 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 **all current data protection regulations**.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 3.3 CCTV will not be used in classrooms with the exception of the Blue room.
- 3.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

4. Covert Monitoring

- 4.1 The school may in exceptional circumstances set up covert monitoring. For example:
 - i) 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;

- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from a member of the senior management team.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

5. Storage and Retention of CCTV images

5.1 Recorded data will normally be retained for a minimum of two weeks, unless an incident occurs which necessitates extraction and retention of said piece of evidence. 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.

5.2 All retained data will be stored securely and processed in line with GDPR and school policies.

6. Access to CCTV images

6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7. CCTV Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves under GDPR.

7.2 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.

7.3 The school will respond to requests within 20 working days of receiving the written request.

7.4 The school may not be able to comply with the request if other people can be seen in the footage and are unable to be edited out.

7.5 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.

8. Access to and Disclosure of Images to Third Parties

8.1 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).

8.2 Requests should be made in writing to the Headteacher.

8.3 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.

9. Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Further Information

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

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- **General Data Protection Regulations**