

William Fletcher Primary School

Where Everyone Counts

Rutten Lane * Yarnton * Oxfordshire * OX5 1LW

Tel: 01865 372301 * e-mail: office.2354@william-fletcher.oxon.sch.uk www.william-fletcher.oxon.sch.uk

CCTV Policy William Fletcher Primary School

This policy was agreed by Governors on: May 13, 2021

This policy is to be reviewed: Annually

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1. PURPOSE

The purpose of this policy is to regulate the management, operations and use of the CCTV system (Closed Circuit television) at William Fletcher Primary School, hereafter referred to as 'the school'.

CCTV systems are installed externally on the premises for the purposes of enhancing security of the building and its associated equipment during both the daylight and the night hours each day. CCTV surveillance at the school is intended for the purpose of:

- Protecting the school buildings and school assets, both during and after school hours;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- Supporting the police in a bid to deter and detect crime;
- Assisting in identifying, apprehending and prosecuting offenders.

The system does not have sound recording capability.

The CCTV is owned and operated by the school, the deployment of which is determined by the school's leadership team.

Any changes to CCTV monitoring will be subject to consultation with staff and members of the school community.

The school's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection regulation (GDPR) 2016/679.

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 operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. 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 use.



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The Code of Practice is published at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently displayed at every CCTV point. In areas where CCTV is used, the school will ensure there are prominent signs placed within the controlled area.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency but is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Equality & Diversity Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g., race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within the school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a pupil attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulations and Data Protection Act 2018.

3. LOCATION OF CAMERAS

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), 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 the images captured comply with the legislation.

The school will make every effort to position the cameras so that their coverage



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is restricted to the outdoor areas of the school premises.

CCTV will not be used within indoor areas of the school premises.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of school buildings and property:** The buildings perimeter, entrances and exits.
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Video Patrol of Public Areas:** Parking areas, main entrance/exit gates
- **Criminal Investigations (carried out by the police):** Robbery, burglary and theft surveillance

4. COVERT MONITORING

The school will not engage in covert surveillance.

5. STORAGE AND RETENTION OF CCTV IMAGES

Recorded data will not be retained for longer than 30 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. The school will store data securely at all times.

6. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV system is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member.

When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.



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7. SUBJECT ACCESS REQUESTS (SAR)

- 7.1 Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.
- 7.2 All requests should be made in writing to the Data Protection Officer who can be contacted via the school office: office.2354@william-fletcher.oxon.sch.uk. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, time, date and location.
- 7.3 The school does not have a facility to provide copies of CCTV footage but instead, the applicant may view the CCTV footage if available and appropriate.
- 7.4 The school will aim to respond to requests within 30 days of receiving the request but if a request is received outside of the school term, this may not be possible.
- 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 on-going investigation.

8. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

- 8.1 There will be no disclosure of recorded data to third parties other than 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 for images should be made in writing to the Data Protection Officer who can be contacted via the school office: office.2354@william-fletcher.oxon.sch.uk.

9. RESPONSIBILITIES

The Headteacher will:

- Ensure the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for security purposes within the school.
- Ensure that all existing CCTV monitoring systems will be evaluated for
- compliance with this policy.



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- Ensure the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy. Maintain a record of access (e.g., an access log) to or release of recordings or any material recorded or stored in the system.
- Ensure that the monitoring recordings are not duplicated for release.
- Ensure that the perimeter view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both pupil and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of 'Reasonable Expectation of Privacy'.
- Ensure that the DVR is stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on DVR are being overwritten after a period of 30 days unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.

10. PRIVACY IMPACT ASSESSMENTS AND PRIVACY BY DESIGN

CCTV has the potential to be privacy intrusive. The school will perform a privacy impact assessment when installing or moving CCTV cameras to consider privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.



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11. POLICY REVIEW

The Headteacher is responsible for monitoring and reviewing this policy. The policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice, Data Protection Officer Advice or commissioner advice may trigger interim reviews.

It is a requirement of the Data Protection Act 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.



Images are being monitored for the purposes of Public Safety, Crime Prevention and Prosecution of Offenders.

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This scheme is controlled by: William Fletcher School

For further information contact: The school office.
Office.2354@william-fletcher.oxon.sch.uk

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DB Cabling

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