

# **Cavendish Close Infant and Nursery School**

## **CCTV policy**

School uses closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how the school uses 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, in the school and on the 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 (Cavendish Close Infant and Nursery School) 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 premises within prominent locations that clearly identifies that CCTV recording is in operation.

Signs are located at the entrance gate, building entrance and inside reception.

### **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 may allow authorised personnel to view footage where the above purposes are considered.

The school will maintain a record of all disclosures.

All requests for access should made in writing to Mrs Diffin, Headteacher, and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

The school 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 has a designated member of staff who acts as the CCTV System Operator. The fully trained member of staff understands the importance of confidentiality and is authorised to access and operate the CCTV system.

The CCTV System Operator is:

- Mrs Manners, School Business Officer

The work of Mrs Manners is overseen and supported by:

- Mrs Tusa, School Business Manager
- Mrs Diffin, Headteacher

### **Storage of footage**

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will be 3 months. At the end of the retention period, the files will be overwritten.

On occasion footage may be retained for longer than 3 months. 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 made secure by the following safeguards:

- the CCTV system operator, has the delegated responsibility for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will check for faults constantly
- 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 located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks

- a register of authorised staff is maintained, reviewed and updated when necessary

### **Covert recording**

The school 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 is taking place 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 of time and related to specific suspected criminal activity
- If the situation arises where the school adopts 'covert recording', there will be a clear 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 and marked for the attention of the Headteacher:

- Mrs Diffin, Headteacher
- Email: [admin@cavclosei.derby.sch.uk](mailto:admin@cavclosei.derby.sch.uk)

### **Review and monitoring**

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

The CCTV System Operator works closely with our Data Protection Officer and will communicate changes to all authorised staff members.

Scheduled review date is during the Summer Term 25.

Summary of Changes	Date
<p>General access to CCTV: added wording that a secure legal basis will need to be provided</p> <p>CCTV System Security: added how often the system checks for faults</p> <p>Covert recording: added or actions that could result in serious breach of staff or volunteer behaviour expectations.</p> <p>All as per DPO policies</p>	May 24 – C Manners
<p><b>CCTV system operation</b> Clarification that the Data Controller is the school.</p> <p><b>General Access to CCTV Footage</b> 'System Manager' title removed for Mrs Diffin throughout document.</p> <p><b>Authorised CCTV system operators</b> Section updated to reflect processes in school and individual responsibilities.</p> <p><b>CCTV system security</b> CCTV system operator replaced system manager in first bullet point.</p> <p><b>Complaints</b> To be marked for the attention of the Headteacher and sent to the admin email address.</p> <p><b>Review and monitoring</b> The CCTV System Operator will communicate changes as these will come directly from the DPO.</p>	05.06.24 – N Tusa
Reviewed – no changes to PHO policy since October 2023	06.06.25 CManners