



# KING JAMES'S SCHOOL, KNARESBOROUGH

## POLICY STATEMENT



### CCTV Policy

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#### 1 Rationale

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at King James's School, hereafter referred to as 'the school'. The school is fully committed to operating a safe environment for students, staff and visitors, as well as to protect school property.
- 1.2 The system, owned by the school, comprises a number of fixed and dome cameras located around the school site which may include sound functionality. All cameras are monitored within the school and by the school's preferred monitoring company.
- 1.3 CCTV systems are based around digital technology and therefore need to be treated as information that will be processed in accordance with the General Data Protection Regulation (GDPR) as it applies in the UK, tailored by the Data Protection Act 2018. This document sets out the accepted use and management of the CCTV system and images to ensure the school complies with GDPR, Human Rights Act 1998 and other legislation. The school has produced this Policy in line with the Information Commissioner's CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.
- 1.4 The Code of Practice will be subject to review periodically, but at least biannually, to include consultation as appropriate with interested parties.
- 1.5 The CCTV system is owned by the school. Deployment of it is determined by the school's leadership team. All authorised operators and employees with access to images will be aware of the procedures and responsibilities that need to be followed.

#### 2 Principles

2.1 The objectives of the scheme are:

- To increase personal safety and reduce the fear of crime, intimidation and physical abuse
- To support the police in a bid to deter, detect and investigate crime
- To protect the school buildings and their assets to ensure they are kept free from intrusion, vandalism, damage or disruption
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school
- To protect and maintain the well-being of young people and vulnerable adults who may be on the site
- Monitor security of buildings
- Identify vehicle movement
- Assist with the identification of actions/activities that might result in disciplinary proceedings against staff and students

### **3 Statement of Intent**

- 3.1 The CCTV system is registered with the Information Commissioner under the terms of GDPR and will seek to comply with the requirements both of GDPR and the Commissioner's Code of Practice.

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates. In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area. The planning and design will endeavour to ensure that the scheme will give maximum effectiveness and efficiency. It is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage. The scheme will monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the school, together with its visitors.

- 3.2 CCTV will not be generally used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored. CCTV will only be used in classrooms where there is the need to monitor the security of equipment, such as I.T.
- 3.3 The school may in exceptional circumstances set up covert monitoring. If such surveillance is requested, for example, by the police for the detection and prevention of crime, specific legal requirements will have to be satisfied, mainly contained in the Regulation of Investigatory Powers Act.
- 3.4 Materials or knowledge secured as a result of the CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.
- 3.5 Static cameras are positioned to ensure that they do not focus on private homes, gardens and other areas of private property.

### **4 System Operation**

- 4.1 The system will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code.
- 4.2 The day-to-day management will be the responsibility of the Director of Business Services, assuming the role of the Data Controller.
- 4.3 The CCTV system will be operated 24 hours each day, every day of the year.

### **5 Control Room**

- 5.1 Access to the CCTV facilities will be strictly limited to the leadership team, pastoral team and caretakers. Recorded data will not be retained for longer than is necessary. 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 The school will ensure that there is a consistent approach across all operating users to managing access to, and the storage of CCTV images.
- 5.3 All retained data will be stored securely.

- 5.4 Where data is to be released to the police, this will only be released to the police on receipt of a Data Release Form and sight of their warrant card.

## **6 Subject access requests**

- 6.1 Individuals have the right to request access to CCTV footage relating to themselves under GDPR. All requests should be made in writing to the Headteacher and include sufficient information to enable the footage relating to them to be identified (eg date, time and location). The school will respond to requests within 30 calendar days of receiving the written request and fee. A fee of £100 will be charged per request. The school reserves the right to refuse access to CCTV footage in line with the Information Commissioner's Office (ICO) CCTV Code of Practice.

## **7 Access to and Disclosure of Images to Third Parties**

- 7.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as law enforcement agencies, prosecution agencies and Insurance companies (or legal representatives) where these would reasonably need access to the data (e.g. investigators). Requests should be made in writing to the Headteacher. 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.
- 7.2 The details of any data released to a third party should be formally recorded, to also include the date of the disclosure, to whom, reasons for the request, information to identify the individual, proof of identity and any other relevant information, such as a crime incident number. If the school cannot comply with the request, the reasons will be documented.
- 7.3 Unlike Data Subjects, third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under GDPR.
- 7.4 Prior to authorisation from the Headteacher, the requesting applicant must have demonstrated and documented that all reasonable procedures and practices were put in place to prevent suspected illegal or unauthorised activity from taking place.
- 7.5 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.
- 7.6 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom. The school's Legal Team may be involved. This decision will likely be taken under the following circumstances:
- informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording
  - there is reasonable cause to suspect that illegal activity is taking place or is about to take place or unauthorised activity is taking place; that may seriously or substantially affect the operation or reputation of the school

## **8 Complaints**

- 8.1 Complaints and enquiries about the operation of CCTV within the school grounds should be directed to the Headteacher in the first instance. Any suspected breach of this Policy by school staff will be considered under the schools Disciplinary Policy and Procedures.

## 9 Data Protection

9.1 For the purpose of GDPR, Veritau is the Data Controller.

- CCTV digital images, if they show a recognisable person, are personal data and are covered by GDPR. This Policy is associated with the schools GDPR Policy, the provisions of which should be adhered to at all times
- The school has registered its processing of personal data (including CCTV) with the Information Commissioner's Office (ICO)

Where new cameras are to be installed on the school premises, Part 4 of the ICO's CCTV Code of Practice will be followed before installation:

- the appropriateness of and reasons for using CCTV will be assessed and documented
- the purpose of the proposed CCTV system will be established and documented
- responsibility for day-to-day compliance with this Policy will be established and documented