

Clitheroe Royal Grammar School
Closed Circuit Television (CCTV) Policy

Staff member responsible: Bursar

Governors' Committee: Estates

Data Protection

Any personal data processed in the delivery of this policy will be processed in accordance with the school's GDPR Policy.

Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Clitheroe Royal Grammar School. The system comprises a number of internal and external day and night cameras located around both the Chatburn Road and York Street site, cameras do not use any sound recording capability.

The policy also incorporates the automatic number plate recognition (ANPR) camera at York Street.

The CCTV is owned and operated by the school.

This Policy takes account of all applicable legislation and guidance, including:

- General Data Protection Regulation ("GDPR");
- CCTV Code of Practice produced by the Information Commissioner;
- Human Rights Act 1998.

This policy sets out the position of the school in relation to its use of CCTV and should be read in conjunction with the schools Data Protection Policy.

Objectives of the CCTV Scheme

The school uses CCTV for the following purposes:

- to deter breaches of the code of conduct or crime;
- to aid in the detection of breaches of the code of conduct or crime;
- to provide a safe and secure environment for students, staff and visitors;
- to protect the school buildings and assets;
- to assist in reducing the fear of crime and for the protection of private property;
- to assist in the prevention of crime and support the Police in apprehending offenders
- to allow automatic vehicular access to Sixth Form;

Statement of Intent

The school will treat the system and all information, documents and recordings obtained in accordance with GDPR.

The school will notify the Information Commissioners Office (ICO) of its use of CCTV as part of the annual data protection registration.

Cameras will be used to monitor activities within the school and grounds to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the students, staff and its visitors.

Staff must not direct cameras outside of the school site at private property, an individual, their property or a specific group of individuals (Directed Surveillance), without written authorisation being obtained from the Headteacher, as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Images will only be released to the media for use in the investigation of a specific crime with the written authority of the Police and in accordance with GDPR. Images will never be released to the media for purposes of entertainment.

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.

The display of warning signs will be clearly and prominently placed, as required by the Information Commissioner's Code of Practice to be placed at all access routes to areas covered by the Scheme.

Operations of the System

The School's CCTV system is capable of recording 24 hours per day, 7 days per week.

The Scheme will be administered and managed by the Bursar, in liaison with the Headteacher and objectives expressed in this Policy. The day-to-day management will be the responsibility of the ICT Network Manager.

The ICT Network Manager is responsible for regularly checking and confirming the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

Access to recorded images is to be strictly controlled by a password system managed by the ICT Manager. Live screens are viewed in the ICT offices and main offices at both sites and the PE office at Chatburn Road. Routine viewing of recorded images is to be limited to:

The Headteacher
The Deputy Headteachers
The Assistant Headteachers
The Bursar
ICT Network Manager
Deputy ICT Network Manager
ICT Technician
Estates Manager
Site Supervisor

When circumstances require, the Headteacher/SLT has authority to allow other members of staff to view recorded images. Members of staff wanting to view specific incidents must obtain permission to do so from a member of SLT and must complete a Data Access Form (Appendix A). All occasions where recorded images are viewed will be entered in a CCTV Data Register held by the Estates Manager and ICT Network Manager.

Storage and Retention of CCTV Images

The ICT Network Manager is to ensure that images are not 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,

retained data will be stored securely.

GDPR does not prescribe any specific minimum or maximum retention periods that apply to systems or footage. Rather, retention should reflect the school's purpose for recording information, which should be informed by the purpose for which the information is collected, and how long it is needed to achieve this purpose.

Images will be recorded and retained on a 30 day rolling period, unless the School is required by law to retain them and/or it is necessary for the school to retain any footage as part of the investigation of an incident.

In the case of the latter the relevant footage will be stored securely until it is no longer required for the purpose for which it was retained. Otherwise, the CCTV System will automatically delete the images it records after 30 days.

Siting Cameras

Cameras will be sited so they only capture images relevant to the purpose for which they are installed (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 images captured comply with the GDPR.

Any request to modify camera positions in response to a particular event or circumstance must be agreed in advance by the Headteacher, the Bursar or a member of the Senior Leadership Team.

Disclosure of Images to Data Subjects (Subjects Access Requests)

GDPR provides data subjects (individuals to whom "personal data" relate) with a right to a copy of the data held about themselves, including those obtained by CCTV, at a reasonable cost for the administration involved.

Requests for data subject access should be made in writing to the Headteacher on an application form (Appendix B) available from the Bursar. Individuals submitting requests should provide sufficient information to enable the footage relating to them to be identified, e.g. date, time and location.

When a request is made the ICT Network Manager will review the CCTV footage, in accordance with the request. If the footage contains only the individual making the request then the individual may be permitted to view the footage, this must be strictly limited to that footage which contains only images of the individual making the request. The ICT Network Manager and Bursar will ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the school must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

Disclosure of Images to Third Parties

The school will only disclose recorded CCTV images to third parties where it is permitted to

do so in accordance with GDPR legislation. CCTV images will only be disclosed to the Police in line with the purpose for which the CCTV system is in place.

If a request is received from the Police for disclosure of CCTV images under Section 29 of the Data Protection Act 1998, then the school must follow the same process as above in relation to subject data access requests. Details should be obtained from the Police as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.

If an order is granted by a court for disclosure of CCTV images then this should be complied with. However, very careful consideration must be given to exactly what the Court order required. If there are any concerns as to disclosure the Headteacher or Bursar should be contacted in the first instance and appropriate legal advice may be required.

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.

A record will be kept within the schools CCTV Data Register of all disclosures which sets out:

- When the request was made and by whom
- The process followed by the ICT Network Manager in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

Breaches of the Policy (including breaches of security)

Any breach of the Policy will be initially investigated by the Bursar and appropriate disciplinary action will be taken. Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

Complaints

Any complaints about the school's CCTV system should be addressed in writing to the Bursar who will carry out the investigation.

Further Information

For further information on CCTV and its use please see below:

- General Data Protection Regulation (UK GDPR)
- CCTV Code of Practice (ICO website <https://ico.org.uk/for-organisations/guide-to-data-protection/>)

ICO are currently updating CCTV Code of Practice (26th April 2023) therefore this is not currently available on the ICO website.

Date of last review	May 2023
Date of approval by Governors	May 2023
Date to be reviewed	May 2025

Appendix A

Clitheroe Royal Grammar School

Data Access Form

To:	Estates Manager/ICT Network Manager Clitheroe Royal Grammar School Chatburn Road Clitheroe Lancashire BB7 2BA
From:	(Member of staff)

I request to see the images recorded by the CCTV system.

My request refers to the following:

Date:	
Time Start:	
Time End:	
Camera	Please indicate the area of the school:
Event/Activity:	

(SLT/Headteacher approval required before any images are viewed)

Approved

Job Title

Appendix B

Clitheroe Royal Grammar School

Data Subject Access Form

To:	Estates Manager/ICT Network Manager Clitheroe Royal Grammar School Chatburn Road Clitheroe Lancashire BB7 2BA
From:	(Name, Address, Telephone Number, Email)

In accordance with GDPR and the Clitheroe Royal Grammar School CCTV Policy I request to see the images of me recorded by the CCTV system.

My request refers to the following:

Date:	
Time Start:	
Time End:	
Camera	Please indicate the area of the school:
Event/Activity:	

(SLT/Headteacher approval required before the release of any images)

Approved

Job Title