

<b>Policy</b>	CCTV Policy
<b>Revision</b>	New
<b>Date adopted</b>	October 2024
<b>Date of next review</b>	October 2027

Please read this policy in conjunction with the policies listed below:

Acceptable Use Policy

Data Protection Policy

Staff Disciplinary Policy

Whistleblowing Policy

Allegations of Abuse Made Against Adults Policy

Records Management Policy

Low-Level Concerns Policy

Safeguarding and Child Protection Policy

CCTV Code of Practice – Information Commissioner’s Office

**Policy Statement**

The purpose of this policy is to regulate and provide guidance for the management, operation and use of the closed-circuit television (CCTV) system at Bracebridge Infant and Nursery School

This policy does not form part of any member of staff’s contract of employment and it may be amended at any time.

**Roles, Responsibilities and Implementation**

The Full Board of Trustees have overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Headteacher.

Leaders have a specific responsibility to ensure the fair application of this policy and all employees are responsible for supporting colleagues and ensuring its success.

This document follows Data Protection Act 2018 guidelines. A review of this document will be conducted in the event of significant changes to the CCTV system or legislation. The CCTV system is owned by the school. Whilst some external elements of it are maintained by external contractors, only school leaders and the administrator have access to footage.

The Headteacher has delegated responsibility for oversight of CCTV on their individual site.

The day-to-day management and operation of the CCTV systems will be the responsibility of the Administrator and the Site Manager.

## **Aims**

- To increase personal safety of all school/site users and reduce the fear of crime.
- To protect the school's buildings/grounds and assets.
- To support the police in a bid to deter, detect and investigate crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To assist in managing the setting.

## **Statement of Intent**

The CCTV system is used following Information Commissioner Guidance under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2018 and will comply with the requirements both of the Data Protection Act 2018 and the Commissioner's Code of Practice. Bracebridge Infant and Nursery School will treat the system, and all information, documents and recordings obtained and used as data which are protected by the Act.

The purpose of CCTV cameras will be to monitor activities within the setting and their grounds to:

- Identify criminal activity occurring, anticipated, or perceived; and
- Secure the safety and wellbeing of all school users and visitors.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Material will not be released to the media and will only be released to the police for the purpose of identification, detection or prevention of crime.

The planning and design of CCTV systems has endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the systems will cover or detect every single incident taking place in the areas of coverage. Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at entry points to the settings

CCTV cameras will be positioned to maintain the dignity and rights of all individuals at all times. For example, CCTV cameras will not be placed in an area where intimate care is taking place.

As far as reasonably possible, all CCTV cameras will avoid focusing on any private residences neighbouring the school site and such areas will be masked from viewing.

## **Operation of the System**

The system comprises of fixed cameras located around the sites. There is one monitoring stations set up in the administrator officer, however the monitor will be positioned where they cannot be viewed by persons other than those authorised.

The CCTV system can be operated 24 hours each day, every day of the year, and this is our default operation.

Any faults in the operating system are sent by the Administrator or Headteacher to the installation company who will action a repair.

## **Access to the CCTV system and recorded footage**

The Headteacher has access to CCTV systems and recorded footage. They are also able to extract footage to show to authorized staff.

Members of the public, including parents/carers, visitors and pupils, are not permitted to view footage without the specific agreement of the School's Data Protection Officer (DPO) and Headteacher

In line with the Data Protection Act 2018 and UK GDPR, Bracebridge Infant and Nursery school will share CCTV footage with law enforcement authorities (for example, the police) who are discharging their statutory

law enforcement functions. This is likely to occur in the following circumstances (although this is not an exhaustive list):

- The School reports a crime, and shares footage relevant to the crime report;
- The School receives a request from a law enforcement authority for CCTV footage we hold; and/or
- A court order or another legal obligation compels the Trust to share the footage with a law enforcement authority.

In the event that a request for CCTV footage is made by a law enforcement authority, a member of SLT will seek authorization from either the School's Data Protection Office or Headteacher. A record will be kept of any footage that is issued to a law enforcement authority.

A copy of the required footage will be released to the appropriate law enforcement authority via a secure method, e.g. a CD rom in a sealed envelope, a secure OneDrive link, or an encrypted storage device.

Footage will only be released to a law enforcement authority on the clear understanding that the footage remains the property of the School and the School retains the right to refuse permission for the law enforcement authority to share the footage with any other person/organisation.

In the event that the law enforcement authority requests that the School retains the footage, for possible use as evidence in the future, the school will do so.

Applications received from outside agencies (e.g. solicitors) to view or release footage will be referred to the School's Data Protection Officer and Headteacher. In these circumstances, recordings may be released where satisfactory evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order. The identities of third parties should be obscured.

### **Covert Surveillance**

If covert surveillance is planned, the decision to implement the surveillance will be made by the Headteacher. All documentation must be retained and no covert surveillance will take place unless all necessary processes and authorisations have been obtained in advance. Covert surveillance will only be used for the purpose of detecting or preventing a crime.

### **Security**

In line with the requirements of the Data Protection Act 2018 and UK GDPR, the Trust has the following security measures in place to protect the data collected:

- The footage is stored on encrypted data stores.
- Only authorised staff have access to the material.
- The servers are updated in line with Cyber Security guidelines.

### **Retention**

CCTV footage is kept for up to 28 x days

CCTV 'extractions'/recordings are retained by the school for 28 x days on a secure USB stick, after which they be deleted.

### **Breaches of the Policy**

Any individual found to be in breach of this policy will be reported to HR, and may be subject to an investigation in line with Staff Disciplinary Policy.

Any concerns about an individual's conduct in relation to this policy should be reported to the Headteacher. If the concern relates to an adult's conduct with children and young people, it should be reported to the

Headteacher or if pertaining to the Headteacher , Chair of Trustees. If necessary, individuals can refer to the following policies for guidance:

-Whistleblowing Policy

-Allegations of Abuse Made Against Adults Policy

-Low-Level Concerns Policy

### **Complaints**

Any complaints about the school's CCTV system should be addressed to the Schools DPO and Headteacher for investigation. Any complainant will be notified of the outcome of the investigation and if they are not satisfied with that outcome, will be provided with information about how to refer the matter to the Office of the Information Commissioner.

Signed

A handwritten signature in black ink, appearing to be 'R Pitman', written in a cursive style.

Mr R Pitman

Chair of Trustees

02.10.24