

# CHEPSTOW SCHOOL CCTV POLICY

Approved by: Full Governing Body

**Last Reviewed on:** 11/07/2024

**Next Review Date:** 13/03/2025

#### 1. Introduction

- 1.1 Chepstow School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.
- 1.2 The system comprises 40 CCTV cameras (including nil PTZ).
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by Definitive Security Solutions, the deployment of which is determined by the school's leadership team.
- 1.5 The CCTV is not externally monitored.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with appropriate persons.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.
- 1.9 All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

#### 2. Statement of Intent

- 2.1 The school complies with the Information Commissioner's Office (ICO) guidance on video surveillance and the Surveillance Camera Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The guidance can be found at:

  Amended Surveillance Camera Code of Practice (accessible version) GOV.UK (www.gov.uk)
- 2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure there are prominent signs placed at the zone's entrance and within the controlled area.

2.3 The planning and design has endeavored 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.

#### 3. Siting the Cameras

- 3.1 Cameras will be sited so they only capture images relevant to the purposes 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 equipment location is carefully considered to ensure images captured comply with the Data Protection Act.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 3.3 Members of staff should have access to details of where CCTV cameras are situated, except for cameras placed for the purpose of covert monitoring.

#### 4. Storage and Retention of CCTV images

- 4.1 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.
- 4.2 All retained data will be stored securely.

#### 5. Access to CCTV images

5.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

#### **Viewing/Control**

- Kelly Waythe, Headteacher
- Victoria Williams, School Business Manager
- Gareth Davies, School Site Manager

#### **Viewing**

- Leighton Cooke, IT Technician (SRS)
- Victoria Bradford, Operations Officer
- Lauren Evans, Headteacher's PA

#### **Request Viewing:**

Senior Leadership Team and Heads of Year.

#### 6. Subject Access Requests (SAR)

- 6.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 6.2 All requests should be made to the Headteacher and School Business Manager. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 6.3 The school will respond to requests within one calendar month of receiving the written request and fee.
- 6.4 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.

#### 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 the police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- 7.2 Requests should be made in writing to the Headteacher and School Business Manager.
- 7.3 The data may be used within the school's discipline and grievance procedures including student behaviour, i.e. exclusion evidence as required, and will be subject to the usual confidentiality requirements of those procedures.

#### 8. Complaints

8.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the School Business Manager, in the first instance.

# Further Information Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioner's Office) <a href="https://www.ico.gov.uk">www.ico.gov.uk</a>
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- Surveillance Camera Code of Practice pursuant to Section 31 (3) of the Protection of Freedoms
   Act 2012
- Biometrics and Surveillance Camera Commissioner GOV.UK (www.gov.uk)

#### Appendix A - Checklist

This CCTV system and the images produced by it are controlled by, School Business Manager who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

Chepstow School has considered the need to use CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked Yes/No (Date)	Ву	Date of next review
There is a named individual who is responsible for the operation of the system		School Business Manager Definitive Security Solutions	June 2025
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.		Definitive Security Solutions	June 2025
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.		Definitive Security Solutions	June 2025
Cameras have been sited so that they provide clear images		Site Manager  School Business  Manager  Definitive Security  Solutions	June 2025
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.		Site Manager School Business Manager Definitive Security Solutions	June 2025

There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s)	Site Manager School Business Manager Definitive Security	June 2025
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them	Solutions Site Manager School Business Manager Definitive Security Solutions	June 2025
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated	Site Manager School Business Manager Definitive Security Solutions	June 2025
Except for law enforcement bodies, images will not be provided to third parties	School Business Manager	June 2025
The Privacy Notice has been updated to reflect the use of CCTV	School Business Manager	June 2025
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made	School Business Manager	June 2025
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	School Business Manager	June 2025