



CCTV Policy

*Like the Phoenix
We rise to our challenges
Strengthen our learning and Shine in
Our community*

| Reviewed: | Approved by | Date of next review |
|------------------------------------|------------------------------------|---------------------|
| Spring 2023 | Resources Committee Spring 2023 | Spring 2025 |
| Completed by: Data Protection Lead | | |

Linked Policies-

CCTV POLICY

1 Policy Statement

- 1.1 Wembley Primary School uses Close Circuit Television (“CCTV”) within the premises of the school. The purpose of this policy is to set out the position of Wembley Primary School as to the management, operation and use of the CCTV at the school.
- 1.2 This policy applies to all members of our Workforce, visitors to Wembley Primary School premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance, including:
 - 1.3.1 General Data Protection Regulation (“GDPR”)
 - 1.3.2 *[Data Protection Act 2018]* (together the Data Protection Legislation)
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner
 - 1.3.4 Human Rights Act 1998
- 1.4 This policy sets out the position of Wembley Primary School in relation to its use of CCTV.

2 Purpose of CCTV

- 2.1 Wembley Primary School uses CCTV for the following purposes:
 - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors
 - 2.1.2 To prevent the loss of or damage to Wembley Primary School buildings and/or assets
 - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3 Description of system

- 3.1 We have 2 CCTV systems. One system has 20 fixed live cameras with no sound recording capabilities. The footage is stored on the CCTV server in the Server Room. The other system has 22 live cameras of which 19 are fixed, the remaining 3 are Motorised PTZ cameras. The position of the motorised cameras are controlled by the operator from the Network Video Recorder, this system also has no recording capabilities.

4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Wembley Primary School will make all reasonable efforts to ensure that areas outside of School premises are not recorded.
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

5 Privacy Impact Assessment

- 5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Wembley Primary School to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 Wembley Primary School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

- 6.1 The CCTV system will be managed by the IT Manager and Facilities Manager.
- 6.2 On a day to day basis the CCTV system will be operated by the IT Manager, Facilities Manager and Site Supervisor.
- 6.3 The viewing of live CCTV images will be restricted to the IT Manager, Facilities Manager, Site Supervisor and Senior Leadership Team.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by the IT Manager, Facilities Manager, Site Supervisor and Senior Leadership Team.
- 6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.6 The CCTV system is monitored daily by the Site Supervisor to ensure that it is operating effectively.

7 Storage and Retention of Images

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 7.2 Recorded images are stored only for a period of 14 days unless there is a specific purpose for which they are retained for a longer period.
- 7.3 Wembley Primary School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1 CCTV recording systems being located in restricted access areas;

- 7.3.2 The CCTV system being encrypted/password protected;
- 7.3.3 Restriction of the ability to make copies to specified members of staff
- 7.4 A log of any access to the CCTV images, including times and dates of access, and a record of the individual accessing the images, will be maintained by Wembley Primary School. This log will not include the daily monitoring/camera check by the Site Supervisor.

8 Disclosure of Images to Data Subjects

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of Wembley Primary School's Subject Access Request Policy.
- 8.3 When such a request is made the IT Manager, Facilities Manager and Senior Leadership Team will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 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 IT Manager, Facilities Manager and Senior Leadership Team must take appropriate measures to ensure that the footage is restricted in this way. Note- neither system can isolate a single person from the crowd
- 8.5 If the footage contains images of other individuals then Wembley Primary School must consider whether:
 - 8.5.1 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;
 - 8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - 8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 8.6 A record must be kept, and held securely, of all disclosures which sets out:
 - 8.6.1 When the request was made;
 - 8.6.2 The process followed by the IT Manager/ Facilities Manager and Senior Leadership Team in determining whether the images contained third parties;
 - 8.6.3 The considerations as to whether to allow access to those images;
 - 8.6.4 The individuals that were permitted to view the images and when; and

- 8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

9 Disclosure of Images to Third Parties

- 9.1 Wembley Primary School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the IT Manager, Facilities Manager and Senior Leadership Team must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency 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.
- 9.4 The information above must be recorded in relation to any disclosure.
- 9.5 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 requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10 Review of Policy and CCTV System

- 10.1 This policy will be reviewed Bi-Annually.
- 10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed Bi-Annually.

11 Misuse of CCTV systems

- 11.1 The misuse of CCTV system could constitute a criminal offence.
- 11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

- 12.1 Any complaints relating to this policy or to the CCTV system operated by Wembley Primary School should be made in accordance with Wembley Primary School Complaints Policy.

CCTV PRIVACY IMPACT ASSESSMENT

1 Who will be captured on CCTV?

Pupils, Staff, Parents/Carers, Volunteers, Governors and all other visitors including members of the public etc

2 What personal data will be processed?

Facial Images, behaviour/movement

3 What are the purposes for operating the CCTV system?

Prevention or detection of crime, to provide a safe and secure environment for Pupils, Staff and all Visitors

4 What is the lawful basis for operating the CCTV system?

Legal Obligation, legitimate interests of the organisation to maintain health and safety and to prevent and aid in the investigation of crime

5 Who is/are the named person(s) responsible for the operation of the system?

Site Manager- Mr Thomas Sheerin
Headteacher- Mrs Taylor-Kent

6 Describe the CCTV system, including:

- a. The CCTV systems were chosen as they provide images that can be used for the purpose they were obtained. They do not record sound and recordings have been set to a 14 day override schedule to result in higher resolution images
- b. All cameras are sited to monitor activity in areas of high footfall, others have been situated for the prevention of crime
- c. Signs notifying individuals that CCTV is in operation are located at the main front door

d. The current system does not enable third party data to be redacted without manual/ technical manipulation

7 Set out the details of any sharing with third parties, including processors

Police, subject access, etc. Careful consideration is given to who has access to the CCTV system. No images are shared with third party processors

8 Set out the retention period of any recordings, including why those periods have been chosen

14 days- to result in a higher resolution of images and not store images for longer than necessary

9 Set out the security measures in place to ensure that recordings are captured and stored securely

Access of recordings are password protected, this is strictly only shared with the Site Manager and Supervisor, the IT Manager and The Senior Leadership Team

10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- Recording is minimal and only in areas of high footfall
- The recordings are destroyed/ overridden continually and have no sound, only facial imagery
- Data breach risks are low as it involves no confidential data

11 What measures are in place to address the risks identified?

- The recordings are destroyed/ overridden every 14 days
- There is very little risk of the system being accessed unlawfully as we have technical measures in place to guard our IT network

We only use a secure network and email system to transfer any information for e.g. to Police. Most images will be viewed on site with only members of staff listed who have access to the CCTV systems present

- 12 Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

Parents are aware that we have a CCTV system in place as it is sign posted clearly in the Main Reception Area. The CCTV Policy is on our website

- 13 When will this privacy impact assessment be reviewed?

This privacy impact assessment will be reviewed with the policy bi-annually

Approval:

This assessment was approved by the Data Protection Officer:

DPO: Deepti Bal, Brent Schools Partnership

Date: 23rd January 2023