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# Lanesend Primary School

## CCTV Policy School Health and Safety Policy

Signed: ..... Date:  
(Headteacher)

Signed: ..... Date:  
(Chair of Governors)

Review Date: September 2021 (Every 3 Years)  
Reviewed By: Site Manger and Child-Centred Group

# Lanesend Primary School - CCTV Policy

## 1. Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Lanesend Primary School. The system comprises a number of cameras located on the school building. All cameras are monitored under access from the school office and are only available to the Headteacher, Administrative staff and Site Manager.

This Code follows Data Protection Act and GDPR guidelines. The Code of Practice will be subject to review to include consultation as appropriate with interested parties. The CCTV system is owned by the school.

## 2. Objectives of the CCTV scheme

- To increase personal safety of staff, children and visitors and reduce the fear of crime
- To protect the school buildings and their assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property

## 3. Statement of Intent

The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements and implementation of the General Data Protection Regulation (GDPR) and the Commissioner's Code of Practice. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act. Cameras will be used to monitor activities within the school grounds to identify adverse activity occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of the school's children and staff, together with its visitors. Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property. The cameras are only located at strategic points throughout the school premises, principally at the entrance and exit points and the play areas around the school. No camera focuses or will focus, on toilets, shower facilities, changing rooms, staff rooms or private offices. There are signs that clearly communicate that the site is covered by CCTV.

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

signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

#### **4. Operation of the system**

The CCTV system will be administered and managed by the school in accordance with the values and objectives expressed in the code. The day to day management will be delegated by the Headteacher to the Site Manager both in school hours and at weekends and during holidays. Viewing of recorded images must take place in the admin office at an appropriate time. The CCTV system will be operated 24 hours each day, every day of the year, recording all activity. All operators and others with access to images must be aware of the access procedures that are in place. The CCTV system records images only and there is not audio recording. Therefore, conversations are not recorded on the CCTV.

#### **5. Control and Liaison**

The Site Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

#### **6. Monitoring procedures**

Camera surveillance may be maintained at all times and footage continuously recorded and held on system memory for seven days. After this time, it is automatically overwritten.

#### **7. Recording and retention of images**

Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images. Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than **one week**. Once a hard drive has reached the end of its use, it will be erased prior to disposal. Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of **one week**. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

#### **8. Access to and disclosure of images**

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- the police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness
- prosecution agencies, such as the Crown Prosecution Service
- relevant legal representatives
- line managers involved with School disciplinary processes
- individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Head teacher (or another authorised person acting in their absence) is the only person who is permitted to authorise disclosure of information to external third parties such as law enforcement agencies.

All requests for disclosure and access to images **will be documented**, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

In order to maintain and preserve the integrity of the usb used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- Each usb must be identified by a unique reference number.
- Before using each usb must be cleared of any previous recording.
- The person responsible for recording will register the date and time of usb recording, including the unique reference number.
- A usb required for evidential purposes must be sealed, witnessed, signed by the person responsible for recording, dated and stored in the safe. If a usb is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the responsible member of staff, dated and returned to the safe.
- If the usb is archived the reference must be noted.

Usbs may be viewed by the Police for the prevention and detection of crime. A record will be maintained of the release of usbs to the Police or other authorised applicants. A register will be available for this purpose. Viewing of usbs by the Police or any external individual must be recorded in writing and entered in the register.

Requests by the Police can only be authorised under section 29 of the Data Protection Act 1998. Should a usb be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.4 of this Code. Usbs will only be released to the Police on the clear understanding that the usb remains the property of the school, and both the usb and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the usb or any part of the information contained thereon. On occasions when a Court requires the release of an original usb this will be produced from the safe, complete in its sealed bag. The Police may require the school to retain the stored usbs for possible use as evidence in the future. Such usbs will be properly indexed and properly and securely stored until they are needed by the Police.

Applications received from outside bodies (e.g. solicitors) to view or release usbs will be referred to the Headteacher. In these circumstances usbs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. This must be provided within 30 calendar days of receiving the required fee and the request. If the decision is taken not to release the images, then the image in question should be held and not destroyed until all legal avenues have been exhausted.

## **9. Individuals' access rights**

Under the **GDPR** individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any of your CCTV images, you must make a written request to the Headteacher. Your request must include the date and time when the images were recorded and the location of the particular CCTV camera, so that the images can be located and your identity can be established as the person in the images. The School will always check the identity of the person making the request before processing it.

The Headteacher will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the School is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

## **10. Training**

Lanesend Primary School will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the GDPR with regard to that system.

## **11. Breaches of the code (including breaches of security)**

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for the Headteacher to take the appropriate disciplinary action. Complaints will be dealt with in accordance with the school Complaints Policy.

## **12. Assessment of the scheme and code of practice**

Performance monitoring, including random operating checks, may be carried out by the Site Manager.

## **13. Complaints**

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be dealt with in accordance with the school Complaints Policy.

## **14. Public information**

Copies of this Code of Practice will be available to the public from the School Office and the school website.

## **Summary of Key Points**

- This Code of Practice will be reviewed every three years.
- The CCTV system is owned and operated by the school.
- Liaison meetings may be held with the Police and other bodies.
- Recording usbs used will be properly indexed, stored and destroyed after appropriate use.
- Usbs may only be viewed by Authorised School Officers and the Police.
- Usbs required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Usbs will not be made available to the media for commercial or entertainment.
- Usbs will be disposed of securely by incineration.
- Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Headteacher.

## **Implementation**

The Academy Trustees are responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a review every three years of the school's use of CCTV.