



## **Dallimore Primary & Nursery School**

### **CCTV Policy**

CCTV is used at Dallimore Primary & Nursery school to monitor pupil behaviour and to record visitors into school. There are two cameras recording continuously. One is located in the entrance area and the other located in the main reception area. Cameras are visible and signage in place.

#### **CCTV Signs**

CCTV signs are erected in the school reception area stating that CCTV recording is in operation. As a school we are registered with the Information Commissioners office (ICO). Our registration number is Z6428633.

#### **The Data Protection Act 2018 and GDPR**

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is “Personal data” means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

The definition of Processing is much wider in its scope than the previous legislation) “Processing”, in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as—

- (a) collection, recording, organisation, structuring or storage,
- (b) adaptation or alteration,
- (c) retrieval, consultation or use,
- (d) disclosure by transmission, dissemination or otherwise making available,
- (e) alignment or combination, or
- (f) restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

#### **Objectives**

The Head Teacher and users of the system will adhere to the code of practice policy statement (Appendix A) and will restrict unauthorised persons from gaining access to recorded images.

#### **Confidentiality**

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of

the system.

### **Copy Recordings**

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the Head teacher or the IT teaching Co-ordinator to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

### **Information Sharing (Section 115, Crime and Disorder Act 1998)**

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities.

The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.

### **Retention**

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is 7 months.

### **Erasure**

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached. Our retention period is 7 months.

### **Covert Recording**

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs is a breach of the Data Protection Act.

However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:

- We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.
- We have reasonable cause to suspect specific criminal activity is taking place.
- That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.

### **Use of Recordings**

The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environs
- Pupil behaviour management, discipline and exclusions

- Staff disciplinary and associated processes and appeals

When using CCTV footage for any of the above purposes it shall be permissible to access and enable relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below.

### **Traceability and Record Keeping**

Any recorded images that are copied to a third party data source will be issued a unique serial number.

Recordings must be logged and traceable throughout their life within the system. If images are copied to a third party media this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a maintenance company.

Original recordings are only found:

- a) Within the recognised secure storage system
- b) Operational in the recording device

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

### **Time and Date Stamping**

The correct time and date is overlaid on the recorded image.

These date and time settings are checked and corrected as part of the routine maintenance visits.

### **Secure Storage of Recordings**

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system.

Recordings and Recording/Processing is only available to authorised persons.



## CODE OF PRACTICE POLICY STATEMENT - CCTV

### Dallimore Primary & Nursery School

This code of practice policy statement relates to the Closed-Circuit Television System installed within Dallimore Primary & Nursery School. The beneficial owner of the system is Dallimore Primary and Nursery School.

The system manager is the Head Teacher of Dallimore Primary & Nursery School who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system. The IT Co-ordinator is trained and authorised to operate the system.

The objectives of the system are to assist in the monitoring of extreme behaviour, the detection of crime, provide evidence of crime and to deter those who have criminal intent and to give confidence to staff and visitors that they are in a secure environment. To also provide management information relating to Health & Safety matters.

#### System

Recording media type	HIK Vision DS-7716NI-14/16E
The system records images from	Colour
Monitors	Can be viewed via network PCs
Moveable cameras	2 fixed cameras
Covert cameras	No
CCTV signs	In reception area - wall behind desk

It is the responsibility of the Head teacher to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

#### General Principles

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.

**This review : November 2022**

**Next review : Autumn 2025**

**APPENDIX A**



**SUBJECT ACCESS REQUEST – CCTV FOOTAGE**

**Dallimore Primary & Nursery School**

**CCTV Footage Request No. \_\_\_\_\_**

Date of footage requested	
Start time of footage requested	
End time of footage requested	
Cameras of required footage	
Current time on recorder	
Person requesting footage	
Position of Person requesting footage	
Organisation requesting footage	
Copy of footage has been recorded to: eg) DC/DVD/USB	
Serial number of copied media disk	

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting [www.ico.gov.uk](http://www.ico.gov.uk).

**Issuer of the above footage**

Name	Signature	Date

**Recipient of the above footage**

Name	Signature	Date
Address		
Identification given		

The school will retain a log of access requests detailing who the requests have been made by.

**APPENDIX B**



**SUBJECT ACCESS REQUEST LOG – CCTV FOOTAGE**

**Dallimore Primary & Nursery School**

Request No.	Date request made	Date requested	Time from	Time to	By (organisation)	By (Name)	Issued (Y/ N)	Date Issued	Issued by: