



HARDENHUISH SCHOOL CCTV POLICY

| | |
|--|---|
| 1. Policy Statement..... | 3 |
| 2. Purpose of CCTV | 3 |
| 3. Description of System..... | 3 |
| 4. Siting of Cameras | 3 |
| 5. Privacy Impact Assessment..... | 4 |
| 6. Management and Access..... | 4 |
| 7. Storage and Retention of Images | 4 |
| 8. Disclosure of Images to Data Subjects..... | 4 |
| 9. Disclosure of Images to Third Parties | 5 |
| 10. Review of Policy and CCTV System | 6 |

1. Policy Statement

- 1.1. Hardenhuish School uses Closed-Circuit Television (CCTV) on its premises. The purpose of this policy is to set out the position of the School with regard to the siting, management, operation and use of CCTV at Hardenhuish School.
- 1.2. This policy applies to all pupils, students, members of our workforce, visitors to the school premises and all other persons whose images may be captured by the CCTV system, including clubs who rent premises from the school.
- 1.3. This policy takes account of all applicable legislation and guidance, including:
 - General Data Protection Regulation (GDPR)
 - Data Protection Act 2018
 - CCTV Code of Practice produced by the Information Commissioner
 - Human Rights Act 1999

2. Purpose of CCTV

- 2.1. A CCTV system is installed (both internally and externally) for the purpose of enhancing security of the buildings and associated equipment as well as creating a mindfulness among the occupants that a surveillance security system is in operation around the premises.
- 2.2. Hardenhuish School uses CCTV for the following purposes:
 - protecting the school buildings and school assets, both during and after school hours;
 - promoting the health and safety of staff, pupils and visitors;
 - preventing bullying;
 - reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
 - assisting in identifying, apprehending, and prosecuting offenders; and
 - ensuring that the school rules are respected so that the school can be properly managed.

3. Description of System

The CCTV system consists of 78 IP cameras (51 internal, 27 external) recording back to a Network Video Recorder (NVR) stored securely on the school premises. Four cameras (one internal, three external) have Pan-Tilt-Zoom (PTZ) capabilities. All external and many internal cameras have infrared capabilities to record footage in low light. None of the cameras have sound recording capabilities. All cameras are fixed in position except for one camera that is re-located around the site in response to specific requirements.

4. Siting of Cameras

- 4.1. Cameras are not sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.
- 4.2. The School has endeavoured to select locations for the installation of CCTCV cameras which are least intrusive to protect the privacy of individuals. Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.
- 4.3. Signs are in place at all entrances and where each CCTV camera is sited to inform individuals that they are in an area within which CCTV is in operation.

5. Privacy Impact Assessment

- 5.1. A privacy impact assessment has been conducted by Hardenhuish School to ensure that the installation is compliant with legislation and ICO guidance.
- 5.2. Hardenhuish 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. On a day-to-day basis the CCTV system is managed and operated by the ICT Support team.
- 6.2. Viewing of live CCTV images and access to stored CCTV images is restricted to the Leadership Team, the ICT Support team, the Site team and designated teaching and support staff.
- 6.3. No other individual will have the right to view or access any CCTV images unless specific authorisation is granted in accordance with this policy.
- 6.4. The NVR stores footage using RAID 10 configuration to ensure the integrity and security of the data.
- 6.5. The NVR is password protected and access is available only when authorised by Senior ICT Support staff. A log of access to the NVR is maintained via the ICT Helpdesk.
- 6.6. Network access to cameras and the NVR is restricted to the ICT Support office and server rooms by the school's firewalls and password protection.
- 6.7. Specific footage required by designated staff is made available securely via Microsoft Stream; only ICT Support staff and specific staff who require access to the selected footage can access the videos.
- 6.8. Footage disclosed to external agencies (e.g. the police) is transferred securely using encrypted media in accordance with the School's Data Protection Policy.

7. Storage and Retention of Images

In accordance with the Data Protection Act, images recorded by the CCTV system are retained only for as long as necessary for the purpose for which they were originally recorded. Unless the CCTV records a specific notified incident, CCTV images are not usually stored for longer than four weeks.

8. Disclosure of Images to Data Subjects

- 8.1. Any individual recorded in any CCTV image is a data subject for the purposes of 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 Act 2018. Such a request must be considered in the context of Hardenhuish School's Data Protection Policy.
- 8.3. When such a request is made, an authorised individual under paragraph 6.2 above 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 authorised individual reviewing the footage must take appropriate measures to ensure that the footage is restricted in this way.

8.5. If the footage contains images of other individuals, then the School will consider whether:

- 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;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained;
- If the answer to the above is negative, whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- A record will be kept, and held securely, of all disclosures which sets out:

8.6. When the request was made;

- The process followed by the authorised person accessing the images in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when;
- Whether a copy of the images was provided and if so, to whom, when and in what format.

8.7. Where a subject access request is made, then unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose), the requester is entitled to a copy in permanent form. The School may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only, a permanent copy does not need to be provided. However, if a permanent copy is requested, this should be provided unless to do so is not possible or would involve disproportionate effort.

9. Disclosure of Images to Third Parties

9.1. Hardenhuish School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with 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, the same process as described in paragraph 8 above for subject access requests, will be followed. Details will 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 exactly should be disclosed.

9.4. Parental requests to view CCTV footage will be considered on a case by case basis. Access will depend upon whether other persons are identifiable in the footage.

9.5. A record will be kept of any information disclosed to third parties.

9.6. If a court order is granted for disclosure of CCTV images, careful consideration will be given as to exactly what the court order requires. If there are any concerns as to disclosure, the School's Data Protection Officer will be consulted in the first instance and legal advice may also 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 annually by the ICT Support Manager.