# CCTV Policy

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| Policy adopted | May 2025 |
| Policy to be reviewed | May 2028 |
| Signed<br><br>Chair of Governors | Headteacher |

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1. Introduction and purpose

We use CCTV and recordings to protect the premises and our equipment inside the building. We use CCTV to protect our staff who can be vulnerable to attack and abuse. We use CCTV to protect pupils and other site users. There are legal restrictions on how we can use CCTV and this policy reflects these measures. The General Data Protection Regulation 2018 covers the processing of images of individuals taken by CCTV cameras. This policy applies to all employees, contractors, temporary or agency staff, consultants, parents, pupils, visitors and any other persons who access the site.

The purpose of the CCTV is therefore to:

- Prevent or detect crime or disorder;
- Apprehend and prosecute any offenders (including using images as evidence in criminal proceedings);
- In the interests of public employee and pupil health and safety;
- Protection of our property and assets.

2. Definitions

For the purpose of the code of practice, the following definitions will apply:

2.1 Location

Sealand Primary School, Farm Road, Garden City, Flintshire, CH5 2HH

2.2 CCTV

Closed Circuit Television System

2.3 Data Protection Controller (DPO)

e2e Education

2.4. Information Asset Owners (IAOs) and controllers Sealand Primary School, Headteacher – Mr. R. Davies

3. Scope of the policy

- We use CCTV in public areas for the protection of the premises, our assets, pupils and employees and site users. We will clearly display notices that we are using CCTV for these purposes in the areas covered.
- We will not use covert CCTV against employees, unless there is no other reasonable alternative
- We will take steps, in line with the GDPR to keep recordings safe and restrict viewing access to authorised staff only.
- Unless required by the police, or for disciplinary purposes, all images from CCTV will be erased after no more than 30 days
- We have the right to use and record CCTV image in and around the schools at all times
- An employee found to be in breach of their employment or who seeks to access CCTV without authority or to damage them will face disciplinary action up to and including dismissal
- The CCTV system will be operated fairly and lawfully and only for the purposes authorised by the school

- The CCTV system will be operated with due regard for privacy of the individual
- Any changes to the purposes for which the CCTV system is operated will require the prior approval of the Governing Body of Sealand Primary School and will be published in advance
- CCTV may be used to allow the school to provide evidence to an independent review panel

4. System Details

The CCTV system consists of a number of overt colour CCTV cameras situated around the school site, which continuously record activities in that area. A map of where the cameras are located is included as appendix 2.

5. Data Protection Act 2018

The eight principles of the GDPR 2018 will be adhered to and any future changes of legislation will be taken into account.

- Obtain and process personal data fairly and lawfully
- Obtain, hold and use data only for the purposes specified
- Use the data only for the purpose, and disclose only to the people, shown within these policies and procedure
- Only hold data, which is adequate, relevant and not excessive in relation to the purpose for which the data is held
- Ensure personal data is accurate and, where necessary, kept up to date
- Hold data for no longer than is necessary
- Personal data will be processed in accordance with the rights of data subjects under the GDPR 2018
- Take security measures to prevent unauthorized or accidental access to, alteration, disclosure, or loss and destruction of information
- Personal data will not be transferred outside the EEA without ensuring there is an adequate level of protection in relation to the processing of personal data

6. Access to Information

The Freedom of Information Act 2000 and the Data Protection Act 2018 will be adhered to. Any request for disclosure of information must be made to the Data Protection Controller.

Requests for information by the Police and other authorities must also be made through the Data Protection Controller.

Individuals who request images will be issued a request form (appendix 1). Upon receipt the School's Data Controller will determine if the request is appropriate and whether there is a duty of care to protect third parties. If the duty of care cannot be discharged then the request can be refused. A written response will be made to the individual giving the decision (and if the request is refused giving reasons) within 30 days of receipt of enquiry. The Data Protection Controller may seek advice from the appropriate Data Protection Officer to make this decision.

7. Primary request to view data

Primary requests to view data generated by the CCTV system are likely to be made by third parties for any one or more of the following purposes:

- Providing evidence in criminal proceedings (Police and Criminal Evidence Act 1984, Criminal Procedures & Investigations Act 1996)
- Providing evidence for civil proceedings or tribunals

- The investigation and detection of crime
- Identification of witnesses
- The investigation on an incident on the premises involving any site user

More commonly, the school may need to access the CCTV system. See 'School access' section.

7a. Third parties

Third parties, which should be required to show adequate grounds for disclosure of data within the above criteria, may include, but are not limited to:

- Police
- Statutory authorities with powers to prosecute
- Solicitors
- Plaintiffs in civil proceedings
- Accused persons or defendants in criminal proceedings

7b. School access

Sealand Primary School will need to ensure the CCTV system is operating correctly. They will check the camera functionality:

- The systems are checked whenever possible
- Often in schools, situations occur when rapid access to the CCTV is needed. In all cases, the '**CCTV – EMERGENCY ACCESS TO VIEW OR COPY IMAGES – BY THE SCHOOL'** form needs to be completed. However, due to the functioning of the school, it may be required that 2 members of the Senior Leadership team access the CCTV.

7c. Governor audit

At the Governors meeting, a Governor will be appointed to audit the CCTV. They will audit twice a year and report back to the committee.

8. Public Information

A copy of this policy will be made available to anyone requesting it.

9. Signage

Signs will be placed in the locality of the cameras. The signs will indicate:

- The presence of monitoring and recording
- The ownership of the system
- Contact telephone number

10. Complaints

Any use of the CCTV system or materials produced which is outside the policy and is inconsistent with the objectives of the system will be considered gross misconduct.

Misuse of the system will not be tolerated; continuing public support is vital. Any person found operating outside these codes without good and reasonable course would be dealt with under the schools disciplinary system. If any breach constitutes an offence under criminal or civil law then court proceedings may be taken.

Any complaint concerning misuse of the system will be treated seriously and investigated by the Governing Body. They will ensure that every complaint is acknowledged in writing within 5 school days, in line with the Complaints Procedure, and will include advice to the complainant of the enquiry procedure to be undertaken.

Where appropriate the Police will be asked to investigate any matter recorded by the CCTV system, which is deemed to be of a criminal nature.

This policy should be read in conjunction with the school's Data Protection and Security Policy.

# APPLICATION TO VIEW CCTV IMAGES

## SECTION 1: APPLICANT DETAILS (to be completed by applicant)

| | |
|---|---|
| **Applicant's name (please print)** | |
| **Address to which reply should be sent** | |
| **Signature of applicant** | |

## SECTION 2: DATA SUBJECT DETAILS (to be completed by applicant)

| | | |
|---|---|---|
| **Surname** | | **Date of Birth** |
| **Forename** | | |
| **Address** | | **Home telephone**<br><br>**Work telephone** |

## SECTION 3: LOCATION OF CAMERA (to be completed by applicant and/or Data Protection Controller).

Please indicate which cameras are required to be viewed to retrieve this data.

| **Date** | **Area** | **Approximate Time** | **Description of clothing etc** |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |

## SECTION 4: DECLARATION STATEMENT (to be completed by applicant)

This section must be signed in the presence of the person who certifies your application (the school's Data Protection Controller).

I declare that the information in this form is correct to the best of my knowledge and that I am entitled to apply for access to personal data referred to above, under the UK Data Protection Act and GDPR 2018.

Please tick the appropriate box:

☐ I am the person named as the Data subject in this application

# OR

☐ I am the agent for the person named and I have completed the authorisation section.

☐ I am the parent/guardian of the person who is under 13 years old and I have completed the authorisation section.

☐ I am the parent/guardian of the person who is under 13 years old and who is unable to understand the request (go to section 6).

☐ I have been appointed by the court to manage the affairs of the person

**Signature:**_____ **ate:** _____

## SECTION 5: COUNTERSIGNATURE (To be completed by the person required to confirm the applicant's identity.)

I (insert full name)_____

Certify that the applicant(name)_____

Has been known to me as a (insert what capacity e.g. employee, parent etc) _____

For _____years and that I have witnessed the signing of the above declaration.

I confirm that I have viewed the following photographic evidence document to confirm identity

_____

Signed _____ Date _____

**SECTION 6: AUTHORISATION STATEMENT** I hereby authorise Sealand Primary School to release CCTV images you may hold relating to the application made in this form, after seeking further advice and guidance from the School's Data Protection Officer, to ensure compliance with the UK Data Protection Act and GDPR 2018.

| | |
|---|---|
| **Name (please print)** | **Position and school** |
| **Address** | **Telephone** |
| **Signature** | **Date** |

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## OFFICIAL USE ONLY

| | | | |
|---|---|---|---|
| **Date request received** | | **Date sent to Data Controller** | |
| **Date form sent to applicant** | | **Date sent to DPO if applicable** | |
| **Date form returned** | | **Data checked on and by (see CCTV procedures -2 signatures required)** | |
| **Certification checked by** | | **Date report returned to applicant** | |

# CCTV – EMERGENCY ACCESS TO VIEW OR COPY IMAGES – BY THE SCHOOLS

| | |
|---|---|
| **Name of person making request** | |
| **Organisation** | |
| **Address** | |
| **Telephone number** | |

**DETAILS OF IMAGE TO BE VIEWED**

| | | | |
|---|---|---|---|
| **Date** | | | |
| **Reason for request** | | | |
| **Signed** | | **Dated** | |
| **Request granted Request granted by (see CCTV procedures – 2 signatures required)** | | **Request denied (reason)** | |
| **Images viewed by who and why** | | | |
| **Outcome of viewing and any actions with dates** | | | |
| **Date actions completed if appropriate** | | | |

**TO BE COMPLETED IF IMAGES ARE TO BE REMOVED/USED AS EVIDENCE**

| | | | |
|---|---|---|---|
| **Reference** | | | |
| **Issued to** | | | |
| **Reason for use of images** | | | |
| **Date issued** | | | |
| **Issued by (see CCTV procedures – 2 signatures required)** | | | |
| **Return Date / destroyed date** | | | |
| **I acknowledge receipt of the above CD/DVD/USB/IMAGE** | | | |
| **Signed** | | **Date** | |

## CCTV protocol

The following personnel only have permission to access the images on the CCTV systems:

**The Headteacher and/or Deputy Headteacher of Sealand Primary School.**

When seeking to view images the following procedure must be followed:

- The form should be signed by the Headteacher who was approached and then countersigned by the Chair of Governors. If this is not possible an email exchange is acceptable.
- Images will be viewed by 2 senior leaders in the school, including the Headteacher.
- In the case of an emergency, e.g. the abduction of a child/serious injury/accident, the Headteacher should immediately view the images, whilst completing the appropriate forms. In the absence of the Headteacher, the Deputy Headteacher can deputise in the role. In the case of an emergency, the Chair/s of Governors should also be informed. In the case of an emergency, the Headteacher reserves the right to request other key members of staff view the images if this is necessary.
- In the case of the police seeking to view CCTV images they must produce the correct Data Protection forms in use for their service.
- In the case of a member of the public, school community or wider community seeking to view CCTV images, they must complete the "**APPLICATION TO VIEW CCTV IMAGES'** form. In this case, the school DPO will support the school in the application consideration
- The CCTV requires regular checks to ensure it is fully operational. A check will be undertaken at least every 3 weeks. The CCTV emergency access request form and the above protocol will be used to achieve this. Reports will be presented to the governing body.

This protocol will be regularly reviewed annually by the governing body.