



CCTV Policy

Approved by: L.Sheldon
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Signed by: Roy Fisher (Chair of Governors) Signed by: Jonathan Clucas (Head Teacher)

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1. Introduction

Layton Primary School uses CCTV for overt surveillance within selected areas of its premises. This policy confirms how the school manages its CCTV systems, determines who has access to the CCTV data and under what circumstances, including the procedures that will be followed in regard to providing access to CCTV data.

Layton Primary School will treat the information obtained by the system as personal data protected under the UK General Data Protection Regulation (UK GDPR). Layton Primary School is the data controller for this personal data as it 'determines the purpose and means of processing of personal data'. Layton Primary School pays an annual fee to the Information Commissioner's Office (ICO) in relation to this processing as required by the Data Protection (Charges and Information) Regulations 2018.

Layton Primary School has implemented this policy on its use of CCTV to ensure it fully complies with the requirements of the following pieces of legislation:

- UK GDPR
- Data Protection Act 2018
- Human Rights Act 1998
- Protection of Freedoms Act 2012
- Freedom of Information Act 2000
- Regulatory and Investigatory Powers Act 2000

2. Scope

This policy applies to the processing of personal data by CCTV systems in any format including video images, still images and sound (if applicable).

This policy applies to all part-time and full-time employees and all other workers (including casual and agency workers, secondment posts and contractors) using the school's CCTV equipment and footage. This policy also applies to volunteers and students (including work experience or work-placement).

3. Objectives

The objectives of the systems are to:

- i. Increase staff and pupil safety
- ii. Support the Police in the prevention and detection of crime;
- iii. Assist in the identification, apprehension and prosecution of offenders;
- v. Protect key buildings and their assets.

Data or knowledge secured as a result of the School's CCTV will not be used for any commercial purpose and will only be released to the Police for use in the investigation of a specific crime upon receipt of appropriate written request from the police (see below).

The planning and design of the system aims to ensure that it will give maximum effectiveness and efficiency, but it cannot guarantee to cover or detect every incident taking place in the areas of coverage.

4. Description of the System

The School's premises have a number of roaming cameras in and outside of their building. The CCTV system will operate continuously 24 hours a day, each day subject to operational considerations such as maintenance and repair.

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

Appropriate signage, as required by the ICO has been placed in key locations in the areas covered by the CCTV.

5. System Governance

The Scheme is administered by the School Business Manager in accordance with this policy and relevant legislation. The School Business Manager will act as the first point of contact for any queries:

The contact details for the School Business Manager are as follows:

Mrs Lisa Sheldon
School Business Manager
Layton Primary School

Under the UK GDPR, it is mandatory organisations who carry out certain types of processing activities to designate a Data Protection Officer (DPO). The DPO's minimum tasks include monitoring compliance with the UK GDPR and other data protection laws.

The contact details for the School's designated DPO are as follows:

Data Protection Officer
Blackpool Council, PO Box 4, Blackpool, FY1 1NA
or email dataprotectionofficer@blackpool.gov.uk

Prior to the installation of any new CCTV cameras, or system, a data protection impact assessment will be conducted by the school to ensure that the proposed installation is compliant with legislation and ICO guidance.

6. System Operation

The system will be periodically checked to confirm the efficiency of the system ensuring the equipment is properly recording and the CCTV operational.

Access to the equipment will be appropriately restricted to Comptech and Premises.

Layton 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:

- The equipment is housed in secure area of the building.
- Only nominated officers have the authorisation to create copies.
- System is password protected.

7. Data Disclosures

The UK GDPR empowers individuals with a right of access, commonly referred to as subject access, which gives them the right to obtain a copy of their personal data as well as other supplementary information. Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the UK GDPR.

Subject access requests can be submitted to the School Business Manager using the contact details above, each request will be considered on a case-by-case basis in conjunction with the DPO. The data subject is not required to use a standard form but Layton Primary School has created one to make it easier for both the school to recognise a subject access request and for the individual to include all the details we might need to locate the information they want. A copy of the form is available in Appendix 1.

Layton Primary School will act on the subject access request without undue delay and at the latest within one month of receipt. In most instances, the School will not charge a fee to comply with a subject access request, unless it is regarded as manifestly unfounded or excessive.

Images will not be disclosed to any other organisations or parties, unless there is a clear legal basis to do so and these bases are set out in a written request, for example the Police for the prevention and/or detection of crime. In these instances appropriate due diligence will be applied to each request and the DPO will authorise disclosure.

A register of disclosures will be maintained by the Layton Primary School recording all requests of images, either by data subjects or third parties, and this will include name, reason for request, time and date.

8. Data Retention

The recorded images are held for 30 days before being deleted.

Systematic checks must be carried out to ensure compliance with the agreed retention period. When the documented period of retention has been reached images must be removed and erased. However, any images that are to be retained as evidence must be kept in a secure location with controlled access.

9. Complaints

If an individual is unhappy with Layton Primary School's use of CCTV, or is unhappy with the School's response to a 'subject access request', they can submit a complaint to the DPO. The DPO will carefully consider each complaint on a case by case basis and submit a response without undue delay.

If the complainant is not content with the outcome of their complaint, they may apply directly to the Information Commissioner's Office. However, the ICO encourage you where possible to exhausts the organisation's complaints procedure. Details on how to submit a complaint to the ICO are available at <https://ico.org.uk/make-a-complaint/>.

9. Document Control

Document owner:	Jonathan Pickup
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Record of Amendments:

Date	Version	Amended by	Description of changes
01.09.2021	0.1	Head of IG/DPO	First Draft
10.09.2021	1.0	Head of IG/DPO	Final Version

Appendix 1

Subject Access Request for CCTV footage Form

Name of data subject	
Contact address	
Location of footage	
Date & time	
Description of the data subject	
Name of requestor (<i>if not data subject</i>) and any authority held	

Completed forms should be returned to:

Mrs Lisa Sheldon
School Business Manager
Layton Primary School