Northern Lights Learning Trust

Hart Primary School

CCTV Policy

Prepared by: Business Manager

Approved by: Marie Leonard – Headteacher

Signature Chair of local governing body: Colin Reid

Review Date: Autumn 2027

The quality of relationships between all members of school staff and pupils, and the relationship with parents and carers is the area that is most commonly associated with the ethos of the schools in our Trust. It is expressed in the terms of sharing and caring.

In the Church schools in our Trust, we follow the teachings of

Matthew 22:39 ‘Love your neighbour as yourself’

John 15:17 ‘This is my commandment: love each other’.

In the none Church schools in our Trust we follow the spiritual ethos of treating others as we would ask to be treated and to care for others with kindness.

In our schools we believe every pupil is an individual who is valued for who they are. We have a series of overlapping networks of relationships, which includes governors, staff, children, parents, church members, and members of the community which the school seeks to serve. Our pastoral work will strive to meet the significant challenge to create and maintain such networks, including in our Church schools in ways which reflect the Gospel. Those who are in leadership roles, which includes all who have a particular responsibility, ensure that by their personal example they set the highest standards expected.

It is from this premise that both Christian and spiritual love will pervade all aspects of life at Northern Lights Learning Trust. It will influence how we reward and teach discipline. It will affect how we value work and the achievements of pupils and staff. It will be seen in the way in which the school environments are created and cared for, in the way in which the needs of pupils, parents, and community are met, and in the way in which teaching and non-teaching staff work together effectively as a team.

Pastoral care pervades all aspects of school life and therefore will be reflected in the way the schools are organised and the policies are written and implemented.

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POLICY AIM

This document will enable staff of Hart Primary School to comply with legislation relating to CCTV in all circumstances.

1. EXECUTIVE SUMMARY

1.1 The purpose of CCTV is to protect the School from anti-social behaviour outside of school hours and provide evidence for investigations of crime.

1.2 The policy will set out the purpose of using CCTV, what information will be recorded, who will have access to this information and how this information will be stored and disposed of.

2. POLICY STATEMENT

2.1. This Policy seeks to ensure that the Close Circuit Television (CCTV) system used at Hart Primary School is operated in compliance with the law relating to data protection (currently the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 ("DPA 2018") and as amended from time to time and includes the principles governing the processing of personal data as set out in Appendix 1. It also seeks to ensure compliance with privacy law. It considers best practice as set out in codes of practice issued by the Information Commissioner and by the Home Office. Hart Primary School therefore uses CCTV only where it is necessary in pursuit of a legitimate aim, as set out in clause 2.2, and only if it is proportionate to that aim.

2.2. Hart Primary School seeks to ensure, as far as is reasonably practicable, the security and safety of all students, staff, visitors, contractors, its property, and premises. Hart Primary School therefore deploys CCTV to:

- promote a safe Hart Primary community and to monitor the security of its premises
- assist in the prevention, investigation, and detection of crime.
- assist in the apprehension and prosecution of offenders, including use of images as evidence in criminal proceedings.

2.3 This policy will be reviewed annually by Marie Leonard, Headteacher to assess compliance with clauses 2.1 and 2.2 and to determine whether the use of the CCTV system remains justified.

3. SCOPE

3.1 This policy applies to CCTV systems in all parts of Hart Primary School and other related facilities.

3.2 This policy applies to all Hart Primary School staff, contractors and agents who operate, or supervise the operation of, the CCTV system including Security Management and Staff and the Data Protection Officer.

4. ROLES AND RESPONSIBILITIES

4.1 Marie Leonard has the overall responsibility for this policy but has delegated day-today responsibility for overseeing its implementation to the staff identified in this policy. All relevant members of staff have been made aware of the policy and have received appropriate training.

4.2 The Business Manager is responsible for ensuring that the CCTV system including camera specifications for new installations complies with the law and best practice referred to in clause 2.1 of this policy. Where new surveillance systems are proposed, The Business Manager will consult with the Data Protection Officer to determine whether a data protection impact assessment is required.

4.3 Only a properly appointed maintenance contractor for Hart Primary School CCTV system is authorised to install and/or maintain it.

4.4 The Business Manager is responsible for the evaluation of locations where live and historical CCTV images are available for viewing. The list of such locations and the list of persons authorised to view CCTV images is maintained by the Business Manager.

4.5 Changes in the use of Hart Primary School CCTV system can be implemented only in consultation with Hart Primary School Data Protection Officer or the Hart Primary School Legal Advisors.

5. SYSTEM DESCRIPTION – FIXED CAMERAS

5.1 The CCTV systems installed in and around Hart Primary School estate cover building entrances, car parks, perimeters, external areas such as courtyards. They continuously record activities in these areas.

5.2 CCTV Cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities etc.

5.3 CCTV cameras are installed in such a way that they are not hidden from view. Signs are prominently displayed where relevant, so that staff, students, visitors, and members of the public are made aware that they are entering an area covered by CCTV. *(The signs also contain contact details as well as a statement of purposes for which CCTV is used*).

5.4 The contact point for queries about CCTV around Hart Primary School should be available to staff, students, and members of the public during normal business hours. Any employees staffing the contact point must be familiar with this document and the procedures to be followed if an access request is received from a Data Subject or a third party.

6. OPERATING STANDARD

6.1 The operation of the CCTV system will be conducted in accordance with this policy.

6.2 No unauthorised person will have access to CCTV.

6.2.1 Other than authorised staff, access to the CCTV will be limited to:

- persons specifically authorised by the Marie Leonard, Headteacher**.**
- maintenance engineers.
- police officers where appropriate; and
- any other person with statutory powers of entry.

6.2.2 Monitors are not visible from outside the Office Manager's office.

6.2.3 Before permitting access to the CCTV, staff will satisfy themselves of the identity of any visitor and existence of the appropriate authorisation. All visitors are required to complete and sign the visitors' log, which includes details of their name, department and/or the organisation that they represent.

6.2.4 A log shall be retained setting out the following:

- person reviewing recorded footage.
- time, date, and location of footage being reviewed; and
- purpose of reviewing the recordings.

6.3 Processing of Recorded Images

8.3.1 CCTV images will be displayed only to persons authorised to view them or to persons who otherwise have a right of access to them. Where authorised persons access or monitor CCTV images on workstations, they must ensure that images are not visible to unauthorised persons.

6.4 Quality of Recorded Images

6.4.1 Images produced by the recording equipment must be as clear as possible, so they are effective for the purpose for which they are intended. The standards to be met in line with the codes of practice referred to clause 1 of these procedures are set out below:

- recording features such as the location of the camera and/or date and time reference must be accurate and maintained.
- cameras must only be situated so that they will capture images relevant to the purpose for which the system has been established.
- consideration must be given to the physical conditions in which the cameras are located i.e. additional lighting or infrared equipment may need to be installed in poorly lit areas;
- cameras must be properly maintained and serviced to ensure that clear images are recorded, and a log of all maintenance activities kept; and
- as far as practical, cameras must be protected from vandalism to ensure that they remain in working order. Methods used may vary from positioning at height to enclosure of the camera unit within a vandal resistant casing.

7. RETENTION AND DISPOSAL

7.1 CCTV images are not to be retained for longer than necessary, considering the purposes for which they are being processed. Data storage is automatically managed

by the CCTV digital records which overwrite historical data in chronological order to produce an approximate 28-day rotation in data retention.

7.2 Provided that there is no legitimate reason for retaining the CCTV images (such as for use in disciplinary and/or legal proceedings), the images will be erased following the expiration of the retention period.

7.3 All retained CCTV images will be stored securely.

8. DATA SUBJECT RIGHTS

8.1 Recorded images, which directly or in combination with other factors enable a data subject to be identified, are considered to be the personal data of the individuals whose images have been recorded by the CCTV system.

8.2 Data Subjects have a right of access to the personal data under the GDPR and DPA 2018. They also have other rights under the GDPR and DPA 2018 in certain limited circumstances, including the right to have their personal data erased, rectified, to restrict processing and to object to the processing of their personal data.

8.3 Data Subjects can exercise their rights by submitting a request in accordance with the Hart Primary School policies.

8.4 On receipt of the request, the Data Protection Officer, or their representative, will liaise with the Business Manager regarding compliance with the request, and subject to clause 10.5, the Data Protection Officer will communicate the decision without undue delay and at the latest within one month of receiving the request from the Data Subject.

8.5 The period for responding to the request may be extended by two further months where necessary, considering the complexity and number of the requests. The Data Protection Officer will notify the Data Subject of any such extension within one month of receipt of the request together with reasons.

9. THIRD PARTY ACCESS

9.1 Third party requests for access will usually only be considered in line with the GDPR and DPA 2018 in the following categories:

- legal representative of the Data Subject.
- law enforcement agencies including the Police.
- disclosure required by law or made in connection with legal proceedings; and
- HR staff responsible for employees and university administrative staff responsible for students in disciplinary and complaints investigations and related proceedings.

9.2 Legal representatives of the Data Subjects are required to submit to Hart Primary School a letter of authority to act on behalf of the Data Subject along with appropriate proof of the Data Subject’s identity.

9.3 The Data Protection Officer will disclose recorded images to law enforcement agencies including the Police once in possession of a form certifying that the images are required for either:

- an investigation concerning national security.
- the prevention or detection of crime; or the apprehension or prosecution of offenders and that the investigation would be prejudiced by failure to disclose the information. Where images are sought by other bodies/agencies with a statutory right to obtain information, evidence of that statutory authority will be sought before CCTV images are disclosed.

9.4 Every CCTV image disclosed is recorded in the CCTV Operating Logbook and contains:

- the name of the police officer or other relevant person in the case of other agencies/bodies receiving the copy of the recording.
- brief details of the images captured by the CCTV to be used in evidence or for other purposes permitted by this policy.
- the crime reference number where relevant; and
- date and time the images were handed over to the police or other body/agency.

9.5 Requests for CCTV information under the Freedom of Information Act 2000 will be considered in accordance with that regime.

10. COMPLAINTS PROCEEDURE

10.1 Any complaints relating to the CCTV system should be directed in writing to the Business Manager, promptly and in any event within 7 days of the date of the incident giving rise to the complaint. A complaint will be responded to within a month following the date of its receipt. Records of all complaints and any follow-up action will be maintained by the relevant office. If a complainant is not satisfied with the response, they may appeal to Marie Leonard, Headteacher.

10.2 Complaints in relation to the release of images should be addressed to the Business Manager, as soon as possible and in any event no later than three months from the event giving rise to the complaint.