

Stanburn Primary School



CCTV Policy

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1. Overview

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Stanburn Primary School, ("the system"). Images are monitored and recorded centrally and will be used in strict accordance with this policy. The system is owned by Stanburn Primary School.
- 1.2 The Head Teacher has initial responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented. They may be contacted as follows:

Ms E D'Souza
Stanburn Primary School,
Abercorn Road,
Stanmore
Middlesex, HA7 2PJ.
Tel: 020 8954 1423

In the absence of the Head Teacher this responsibility transfers to the Site Supervisor. They may be contacted as follows:

Site Supervisor
Stanburn Primary School,
Abercorn Road,
Stanmore,
Middlesex, HA7 2PJ.
Tel: 020 8954 1423.

General Data Protection Regulations: CCTV digital images, if they show a recognisable person, are personal data and are covered by the UK General Data Protection Regulations. This Policy is associated with the Stanburn Primary School General Data Protection Policy, the provisions of which should be adhered to at all times.

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 (DPA2018), the United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time

2. The system

- 2.1 The system comprises: fixed position cameras; monitors and digital recorders. The system does not have sound recording.

- 2.2 Cameras will be located at strategic points on the complex, principally at main entrances. No camera will be hidden from view. A list of locations is given at Appendix 1.
- 2.3 Signs will be prominently placed at strategic points and at entrance and exit points of the school to inform staff, visitors, and members of the public that CCTV installation is in use.
- 2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

3. Purpose of the system

- 3.1 The system has been installed by The Banham Group with the primary purpose of reducing the threat of crime generally, protecting Stanburn Primary School premises and helping to ensure the safety of all Stanburn Primary School staff and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- Deter those having criminal intent
- Assist in the prevention and detection of crime
- Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to managers and/or to a member of staff against whom disciplinary or other action is, or is threatened to be taken.
- Facilitate the movement of vehicles on site.
- In the case of staff to provide management information relating to employee compliance with contracts of employment.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking.
- In classrooms, nor will focus on private homes, gardens and other areas of private property.

3.2 Covert recording

3.2.1 Covert cameras may be used under the following circumstances on the written authorisation or request of the DPO/the Head Teacher and where it has been assessed re: General Data Protection Regulations by the DPO

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

3.2.2 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.

3.2.3 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

4. Monitoring of images

4.1 Images captured by the system will be recorded at the Site Manager's Office, twenty-four hours a day throughout the whole year. Monitors are sited in the School, Finance and Site Manager's offices and are not visible from outside the rooms.

4.2 No unauthorised access to the Site Manager's office will be permitted at any time. Access will be strictly limited to Senior Leaders, Office Staff, Site staff, Police officers and any other person with statutory powers of entry. A list of those members of staff authorised to access the Control Room is given at Appendix 2.

4.3 Access may be granted by The Head teacher and/or Site Manager to persons with a legitimate reason to enter the Site Managers office on a case by case basis.

5. Staff

5.1 All staff working in Site Manager's office will be made aware of the sensitivity of handling CCTV images and recordings. The DPO will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.

5.2 Training in the requirements of the General Data Protection Regulations will be given to all those required to work in Site Manager's office by the DPO.

6. Recording, Storage and Retention of Images

- 6.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents are recorded in real time.
- 6.2 Images will normally be retained for 30 days from the date of recording, and then automatically overwritten. Once a hard drive has reached the end of its use it will be erased prior to disposal and the Disposal Log will be updated accordingly.
- 6.3 All hard drives and recorders shall remain the property of Stanburn Primary School until disposal and destruction. Destruction will take place in the form of running a data erasing software or physical destruction.

7. Access to images

- 7.1 All access to images will be recorded in an Access Log.
- 7.2 Access to images will be restricted to those staff need to have access in accordance with the purposes of the system. A list of such staff is given at Appendix 2.
- 7.3 The Head teacher and/or Site Manager may at times request another member of staff to view images, accompanied and logged.
- 7.4 Access to images by third parties.

7.4.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder.
- Prosecution agencies.
- Relevant legal representatives.
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime.
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

- 7.5 Access to images by a subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.

7.5.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to Stanburn Primary School. Subject Access Request Forms can be requested via email at office@stanburn.harrow.sch.uk. A response will be provided and in any event within 1 month of receiving the request.

7.5.2 The General Data Protection Act gives Stanburn Primary School the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

7.5.3 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 month, stating the reasons.

8. Complaints

8.1 It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to the school office at office@stanburn.harrow.sch.uk. If you feel that you cannot complain to the school office, or have any concerns or enquiries relating to the provisions of the General Data Protection Regulations and/or The Data Protection Act 2018, you should contact our external Data Protection Officer, The DPO Centre at advice@dpocentre.com. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

9. Data breach

9.1 A “Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”

9.2 In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the Incident Response Team (IRT), comprised of The DPO Centre as well as the Head Teacher and Business Manager.

9.3 Immediate steps will be taken to ensure that the breach is contained and the effects of the breach minimised and mitigated as much as possible.

9.4 If the data breach is deemed by the IRT to be reportable to the Information Commissioner’s Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/> or by telephone: **0303 123 1113**

9.5 In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

10. Compliance monitoring

- 10.1 The contact point for staff or members of the public wishing to enquire about the system will be The DPO Centre by pre-arranged appointment.
- 10.2 Upon request enquirers will be provided with:
- A summary of this statement of policy
 - An access request form if required or requested
 - A subject access request form if required or requested
 - A copy of Stanburn Primary School complaints procedures
- 10.3 All documented procedures will be kept under review and a report periodically made to senior management.
- 10.4 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.

Appendix 1

Camera No.	Location	Type
1	Visitors Entrance Pedestrian Footpath.	Fixed Camera with Night Vision.
2	Exterior area outside the School Office.	Fixed Camera with Night Vision.
3	Main Car Park Gates.	Fixed Camera with Night Vision.
4	Staff/KS2 Entrance Pedestrian Footpath.	Fixed Camera with Night Vision.
5	Exterior Entrance to Finance Office Lobby.	Fixed Camera with Night Vision.
6	Annex Building First Floor Corridor.	Fixed Camera.
7	KS1 Double Gates.	Fixed Camera with Night Vision.
8	School Office Reception.	Fixed Camera.
9	First Floor Landing/Resources Room.	Fixed Camera.
10	KS1 Playground.	Fixed Camera with Night Vision.
11	KS2 Playground.	Fixed Camera with Night Vision.
12	Rear of Reception Classrooms.	Fixed Camera with Night Vision.
13	Annex Building Ground Floor Entrance.	Fixed Camera.
14	Annex Building Ground Floor Rear Doors.	Fixed Camera.
15	Annex Building Top of Stairs	Fixed Camera.
16	Main Entrance Lobby	Fixed Camera.

Appendix 2

Name	Job Title/Role	Contact Details	Email
Ms E D'Souza	Head Teacher	0208 954 1423	office@stanburn.harrow.sch.uk
Mr M Echehamta	Temp Site Supervisor	0208 954 1423	office@stanburn.harrow.sch.uk
Mr B Dickens	Caretaker	0208 954 1423	office@stanburn.harrow.sch.uk
Mr L De Cunha	Assistant Caretaker	0208 954 1423	office@stanburn.harrow.sch.uk
Mrs E Anyia	Business Manager	0208 954 1423	office@stanburn.harrow.sch.uk
Ms L Walsh	Deputy Head	0208 954 1423	office@stanburn.harrow.sch.uk
Miss C Crane	Assistant Head	0208 954 1423	office@stanburn.harrow.sch.uk
Mrs R Malik	Assistant Head	0208 954 1423	office@stanburn.harrow.sch.uk
Miss K Patel	Assistant Head	0208 954 1423	office@stanburn.harrow.sch.uk
Ms A Joshi	Attendance & Admission Officer	0208 954 1423	office@stanburn.harrow.sch.uk
Mrs H Miyanger	HR Officer	0208 954 1423	office@stanburn.harrow.sch.uk
Mrs D Skenderaj	Receptionist	0208 954 1423	office@stanburn.harrow.sch.uk
Ms H Patel	Finance & Admin Assistant	0208 954 1423	office@stanburn.harrow.sch.uk
Mrs S Thevanesan	PA to Head Teacher	0208 954 1423	office@stanburn.harrow.sch.uk

Appendix 3

CCTV Internal Access protocols

1 Incident occurs

- An incident on the school grounds occurs in which CCTV should be reviewed.

2 Request for footage

- A Request for footage should be emailed to the Site Supervisor • Site Supervisor, SLT and The Business Manager do not require permission to request footage •All other staff should get approval (via email) from the Site Supervisor or SLT for footage

3 Footage reviewed

- Site Supervisor to review footage on behalf of requester •Site Supervisor to show footage to requester (If deemed appropriate)

4 Footage released or stored

- Footage can be released to SLT (Register of CCTV releases to be kept on behalf of DPO) • Footage can be released to other staff members if approved by SLT/SS (release added to register)

5 Footage deleted

- Footage should be deleted when not required anymore.

CCTV Access Record

Date of Access	Time of Access	Reason for access	Person Requiring Access	Authorised By

Appendix 4

CCTV Hardware Disposal Log

CCTV Number	Date of Disposal	Authorised By