



The Henslow School **CCTV use in School**

This policy covers the following areas;

- Objectives of the system
- Notification
- CCTV signage and CCTV coverage areas
- Access to, Storage and retention of CCTV images
- Responsibilities of the Head Teacher

Objectives

CCTV systems are installed (both internally and externally) in premises for the purpose of

- protecting the School buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, students and visitors as well as for monitoring student behaviour;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the School rules are respected so that the School can be properly managed.

The surveillance security system is in operation within and/or in the external areas of the premises during both the daylight and night hours each day.

The system has sound recording capability.

Notification

The use of CCTV is detailed on the school website

All students are informed of the use of CCTV on their induction to the school

All relevant professionals are informed of the use of CCTV prior to commissioning a placement at the Henslow school

Details of CCTV and rights to erasure are included in the school privacy policy

Signage

The presence of CCTV is identified with appropriate and prominent signage notifying individuals that CCTV is in operation in a particular area.

Signs are of an appropriate size to ensure they can be easily read and can be viewed before individuals come onto the site.

Coverage areas for CCTV

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that

reasonable privacy expectations are not violated. The Head Teacher will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation and privacy requirements.

Every effort will be made to position the cameras so that their coverage is restricted to the School premises, which includes both indoor and outdoor areas.

CCTV will not be used in classrooms but in limited areas within the School that have been identified by staff and pupils as not being easily monitored.

Members of staff will have access to details of where CCTV cameras are situated, no cameras are in place for the purpose of covert monitoring.

Internally communal areas will be monitored for the purpose of supporting student safety and discouraging anti-social behaviour. Cameras will not be sited in areas where privacy might be expected, e.g. toilets, etc.

Cameras will be positioned where they cannot be easily re-positioned, e.g. not within easy reach.

Internally Cameras are situated in the following areas;

Main school House

Reception corridor (both ends)

Landing corridor

Annex 1

Main corridor area

Annex 2

External only

Cottage

External only

Viewing, use and security and storage of CCTV images

Access to CCTV Images

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Head teacher. The Head teacher may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis and in compliance with the stated purposes detailed in this policy..

A CCTV log will be retained at the school if any footage is recorded and retained for use, whilst the Head teacher is responsible for authorising access to CCTV it is reasonable for the administrator to update and store the records of such access.

Where an individual asks for a copy of CCTV footage that contains identifiable individuals then this will be treated as a subject access request (SAR) and dealt with under the UK Data Protection Act 2018. See below for more detail.

Viewing/storage of CCTV images

Recorded data will not be retained for longer than one month (4 weeks) except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than one month an electronic file held on a secure central server where specific CCTV image/recordings are retained will be kept.

The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the School's purposes for recording information, and how long it is needed to achieve this purpose.

The School will store data securely at all times.

Subject Access requests

Individuals have the right to request CCTV footage relating to themselves/their children under the UK Data Protection Act 2018 and the UK GDPR 2018.

All requests should be made in writing to the Reflexion Care Group Ltd Human Resources Manager who can be contacted by email Julie.arrowsmith@newreflexions.co.uk

Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

The School will respond to requests within 30 days of receiving the request but if a request is received outside of the School term this may not be possible.

The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals, jeopardise an on-going investigation or meet the criteria for relevant exemptions to be applied under the UK Data Protection Act/GDPR 2018..

The data may be used within the School's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Responsibilities

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the School.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV, materials stored in compliance with this policy, consulting with the proprietors where required
- Maintain a record of access (e.g. an access log) to any material stored in the system.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the School and be mindful that no such infringement is likely to take place.

- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.

Date of last review	September 2023
Reviewed by	J Brooks and M Clarke and Data Protection officer
Next review due	September 2024