



Blackburn with Darwen Borough Council

CCTV in Schools Policy



Written by	BwD
Ratified by Governors	22 nd June 2023
Last reviewed	20 th June 2024
Date for Review	June 2025
Signed – Chair of Governors	Trevor Anderton
Signed – Headteacher	Catherine Clayton-Young

This policy has been impact assessed by Priti Gohil in order to ensure that it does not have an adverse effect on race, gender or disability equality.

Equality Impact Assessment

Under the Equality Act 2010 and 2017 we have a duty not to discriminate against people on the basis of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. This policy has been equality impact assessed and we believe that it is in line with the Equality Act as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Safeguarding Statement

At Griffin Park we respect and value all children and are committed to providing a caring, friendly and safe environment for all our pupils so they can learn, in a relaxed and secure atmosphere. We believe every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm. This is the responsibility of every adult employed by, or invited to deliver services at Griffin Park. We recognise our responsibility to safeguard all who access school and promote the welfare of all our pupils by protecting them from physical, sexual and emotional abuse, neglect and bullying.

Wellbeing Vision

At Griffin Park we recognise the importance of emotional wellbeing. We understand that the wellbeing of our children is affected by the wellbeing of the adults they interact with, therefore it is essential that we help protect and promote the emotional health and wellbeing of each and every member of our school community.

Introduction

The use of closed-circuit television in schools and colleges has increased significantly in recent years and has become more extensive and intrusive. While the use of such surveillance may be perceived as a positive measure to help enhance security, CCTV cameras can also lead to a climate of paranoia among students and staff, especially if prior consultation has been inadequate.

This policy is designed to demonstrate transparency relating to the use of CCTV in school and outline the schools obligations when operating CCTV systems.

1. Legal Requirements

Schools have a statutory requirement to notify the Information Commissioner that they are installing CCTV and also to state clearly and precisely the purposes for which it is being employed, including the dissemination and distribution of all data collected. The Information Commissioner's Office (www.ico.gov.uk) is the UK's independent authority overseeing protection of personal information. Schools have to renew the notification annually as well as inform the Information Commissioner if any changes are made to the use of CCTV which affect the purposes for collecting and processing personal data.

The actual use of CCTV is affected by statutory legislation. The 2012 Protection of Freedoms Act <http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted> includes guidance on the deployment and use of surveillance cameras and schools should also be aware of other legislation including the General Data Protection Regulation (GDPR), the Data Protection Act 2018, the Human Rights Act 1998 and, on occasion, the Regulation of Investigatory Powers Act 2000. Schools must ensure that they are not in possible breach of these regulations.

At present no new guidance on CCTV has been issued since the inception of GDPR by the Information Commissioner's Office however information is now available from the Commissioner's office giving data protection guidance for schools based on previous legislation. It clearly states that CCTV operation needs to be in line with the data protection principles because it involves the processing of personal information. Staff, students and visitors should be told why the school is using CCTV. It is worth noting that despite the change in legislation the same basic principles and practices for managing a CCTV system within a school still apply. For example the CCTV system should be accompanied with appropriate signage providing details of who operates the system and how to contact them.

Cameras should only be sited where they are needed for their stated purpose and should not prejudice anybody's rights and freedoms or unnecessarily intrude into their privacy. Schools should have a fixed retention period for CCTV footage and should control who has access to the footage and why. Individuals can request CCTV images in subject access requests.

The primary uses for the system include but are not limited to:

- The prevention and detection of crime – including site security and the security and safety of staff, pupils and all other visitors to the site
- The health and safety of staff, pupils and all other visitors to the site – this may include reviewing footage as part of the process of resolving disputes or incidents in the playground

The report is on the ICO website at:

http://www.ico.gov.uk/for_organisations/data_protection/working_with_the_ico/~media/documents/library/Data_Protection/Research_and_reports/report_dp_guidance_for_schools.ashx

There is also useful information at:

http://www.ico.gov.uk/news/latest_news/2012/~media/documents/library/Data_Protection/Research_and_reports/summary_report_dp_guidance_for_schools.ashx

2. Considerations

The school has completed the following in relation to the use of CCTV cameras in school:

- Sought advice from Blackburn with Darwen Council's Information Governance team on the use and location of CCTV cameras and whether they comply with the ICO CCTV Code of Practice.
- Considered whether there are other solutions to the problems the school wishes to address with CCTV and whether these are more appropriate and justified using CCTV and the locations.
- Carried out a Data Protection Impact Assessment which considers the effect CCTV would have on students, staff and other individuals.

3. The CCTV System

- The system comprises of five fixed and two dome cameras.
- The system does not have sound recording capability.
- The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- CCTV advisory signs will be clearly and prominently placed.
- The CCTV is monitored centrally from the school office by the School Business Manager and BWD control room for the school the Data Controlling Officer is Headteacher.
- Changes to CCTV monitoring will be subject to consultation with staff and the school community.
- The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018.
- All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

4. Access to CCTV Footage

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

The initial viewing of live and recorded images of CCTV within Griffin Park Primary School is restricted to the data controlling officer only and/or the appropriate trained deputy to cover any absence. Any recorded images are viewed in a restricted area the school office, where the content cannot be seen from the outside.

5. Storage and Retention of CCTV Images

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.

The retention period for stored images recorded by Griffin Park Primary School CCTV system is 60 Days

For all data that is retained for possible future viewing, a register is be maintained, detailing relevant information such as date, time and length of the original recording, as well as the locations covered and

groups or individuals recorded. Reviews of stored images should be regularly conducted, so that obsolete stored material can be deleted securely.

6. Subject Access Requests for CCTV Images

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR. All requests should be made in writing to the Headteacher, Griffin Park Primary School, Cavendish Place, Blackburn, BB2 2PN. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. (eg. date, time and location).

If the footage is for that of a pupil aged over 13 and the request has come from a parent or carer you should ensure that you have the pupil's consent for the images to be disclosed.

The school will respond to requests within a month of receiving the written request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and other Service Providers where legislation dictates.

7. Complaints

Complaints and enquiries about the operation of CCTV within Griffin Park Primary School should be directed to the Headteacher in the first instance.

8. Further Information

Further information on CCTV and its use is available from the following:

- The Information Commissioners Office CCTV Code of Practice 2014 <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Regulation

Reviewed: June 2023

Next review: June 2024