



Closed Circuit Television Policy (CCTV)

2024 - 25

Introduction

At Northleigh House School we use closed circuit television (CCTV) images to protect all property and to provide a safe and secure environment for employees and visitors to the school, including Safeguarding. All images that are captured are usable for the purposes we require, in any such instances, to help take action to prevent a crime and keep all safe.

This policy operates in conjunction with the School's Data Protection Policy. Northleigh House School does not condone the use of covert surveillance when monitoring the school staff, students and/or volunteers. Covert surveillance will only be operable in extreme circumstances.

The CCTV system is owned by the school. Images from CCTV are strictly controlled and monitored by authorised personnel only.

Roles & Responsibilities

The role of the Data Protection Officer (DPO) includes:

- Dealing with Freedom of Information requests and Subject Access Requests (SAR) in line with all legislation.
- Ensures CCTV footage is destroyed in line with legal requirements.
- Keeps comprehensive and accurate records of all data processing activities, making these records public upon request.
- Prepare reports and Management Information on the school's level of risk related to data protection.
- Prepare reports to Management and Trustees as and when appropriate.

Data Protection Principles

Data collected from CCTV will be:

- All reasonable steps will be taken to ensure accurate and up-to-date data is held, and any inaccurate data will be erased/rectified without delay.
- Kept in a form which permits identification of data subjects for no longer that is necessary. Personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest or statistical purposes.

Location of Cameras

Cameras are located throughout the school and around business premises. No camera focuses or will focus on toilets. All cameras are clearly visible. Appropriate signs are displayed so students, employees, volunteer's and other visitors are aware they are entering an area covered by CCTV.

Recording & Retention of Images

Images produced by the CCTV equipment are intended to be as clear as possible, so they are effective for the above purposes. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly.

As the recording system records digital images, any CCTV images that are held on the hard drive or server are deleted and overwritten on a recycling basis. Once the hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred onto, removable media such as CD's or which are stored digitally are erased or destroyed once the purpose of the recording is no longer relevant.

Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images filmed are recorded

The images that are filmed are recorded centrally and held in a secure location.

Access to recorded images is restricted to the CCTV system and to staff authorised to view. Viewing of recorded images will take place in a restricted area.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The Police and other law forcing agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with disciplinary and performance management processes.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

Individuals' Access Rights

Under the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that the School holds about them, including CCTV images if they are recognisable from the image. If you wish access to any CCTV relating to you, you must make a written request to the Chair of Trustees, Viv Morgan. This can be done by using this email address - viv@northleigh.co.uk

The School will usually not make a charge for such a request but may charge a reasonable fee if you make requests which are deemed excessive.

Your request must include the date and approximate time when the images were recorded and the location of the CCTV camera. If the School is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised.

Implementation

The Chair of Trustees is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of the School's use and processing of CCTV images and always ensure that it remains compliant with the laws regulating data protection and privacy. Any complaints or enquires in relation to the CCTV system, should be addressed to Viv Morgan.

Data Protection

The School will process the personal data collected in connection with the operation of CCTV Policy in accordance with its Data Protection Policy. Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to Viv Morgan. Reported data breaches will be investigated and may lead to disciplinary procedures.

Review date: September 2025