

BLUE COAT CHURCH OF ENGLAND SCHOOL AND MUSIC COLLEGE



CCTV Policy

Updated: April 2018
Policy Duration: 1 Years

1 Policy Statement

- 1.1 Blue Coat Church of England School uses Close Circuit Television (“CCTV”) within the premises of Blue Coat Church of England School. The purpose of this policy is to set out the position of Blue Coat Church of England School as to the management, operation and use of the CCTV at Blue Coat Church of England School.
- 1.2 This policy applies to all members of our Workforce, visitors to Blue Coat Church of England School premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance, including:
 - 1.3.1 General Data Protection Regulation (“GDPR”)
 - 1.3.2 *[Data Protection Act 2018]* (together the Data Protection Legislation)
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner
 - 1.3.4 Human Rights Act 1998
- 1.4 This policy sets out the position of Blue Coat Church of England School in relation to its use of CCTV.

2 Purpose of CCTV

- 2.1 Blue Coat Church of England School uses CCTV for the following purposes:
 - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors
 - 2.1.2 To prevent the loss of or damage to Blue Coat Church of England School buildings and/or assets
 - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3 Description of system

- 3.1 The main CCTV system consists of 38 cameras which stream images to a central server. Sound is not recorded. 3 cameras are of the pan/tilt/zoom type, others are fixed.
- 3.2 The Gate Entry system consists of 3 cameras which live stream images to Reception. Visitors can press a button to speak with staff to request access to the site. Recordings are not made.

4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.
- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Blue Coat Church of England School will make all reasonable efforts to ensure that areas outside of Blue Coat Church of England School premises are not recorded.
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

5 Privacy Impact Assessment

- 5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Blue Coat Church of England School to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 Blue Coat Church of England School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

- 6.1 The CCTV system will be managed by Rosalyn Taylor.
- 6.2 On a day to day basis the main CCTV system will be operated by the ICT Support department. The Gate Entry system will be operated by receptionists and school admin staff.
- 6.3 The viewing of live CCTV images will be restricted to ICT Support staff and Site Services Officers.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by the ICT Support department, Site Services Officers, Pastoral Leaders and the Senior Leadership Team.
- 6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.6 The CCTV system is checked daily by the ICT Support department to ensure that it is operating effectively

7 Storage and Retention of Images

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

- 7.2 Recorded images are stored only for a period of 28 days unless there is a specific purpose for which they are retained for a longer period.
- 7.3 Blue Coat Church of England School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1 CCTV recording systems being located in restricted access areas;
 - 7.3.2 The CCTV system being encrypted/password protected;
 - 7.3.3 Restriction of the ability to make copies to specified members of staff
- 7.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Blue Coat Church of England School.

8 Disclosure of Images to Data Subjects

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Blue Coat Church of England School's Subject Access Request Policy.
- 8.3 When such a request is made the ICT Support department will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The ICT Support department must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5 If the footage contains images of other individuals then Blue Coat Church of England School must consider whether:
 - 8.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - 8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - 8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

- 8.6 A record must be kept, and held securely, of all disclosures which sets out:
 - 8.6.1 When the request was made;
 - 8.6.2 The process followed the ICT Support department in determining whether the images contained third parties;
 - 8.6.3 The considerations as to whether to allow access to those images;
 - 8.6.4 The individuals that were permitted to view the images and when; and
 - 8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

9 Disclosure of Images to Third Parties

- 9.1 Blue Coat Church of England School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the ICT Support department must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- 9.4 The information above must be recorded in relation to any disclosure.
- 9.5 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10 Review of Policy and CCTV System

- 10.1 This policy will be reviewed annually.
- 10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

11 Misuse of CCTV systems

- 11.1 The misuse of CCTV system could constitute a criminal offence.
- 11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

- 12.1 Any complaints relating to this policy or to the CCTV system operated by Blue Coat Church of England School should be made in accordance with the Blue Coat Church of England School Complaints Policy.