



**WELL GREEN PRIMARY SCHOOL, HALE**

**CCTV**

**POLICY DOCUMENT**

**WELL GREEN PRIMARY SCHOOL  
CCTV POLICY  
*June 2024***

## **Introduction**

### **Objectives**

The purpose of the CCTV system is to assist the school in reaching these objectives:

- (a) To protect pupils, staff and visitors against harm to their person and/or property.
- (b) To increase a sense of personal safety and reduce the fear of crime.
- (c) To protect the school buildings and assets.
- (d) To support the police in preventing and detecting crime.
- (e) To assist in identifying, apprehending and prosecuting offenders.
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- (g) To assist in managing the school.

### **Purpose Of This Policy**

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school comprises of 4 fixed cameras situated around the school. The cameras DO NOT record. They are used to observe visitors at the door and monitor live action on the playground.

### **Statement of Intent**

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.

### **System Management**

Access to the CCTV system and data shall be password protected.

The CCTV system will be administered and managed by Mrs J Owen, School Business Manager who will act as System Manager and take responsibility for restricting access, in

accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by Mrs K Markham, Headteacher.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation for 24 hours each day, everyday of the year, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned in paragraph 5.3 above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

### **Downloading Captured Data onto Other Media**

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each download media must be identified by a unique mark.
- (b) Before use, each download media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of download media insertion, including its reference.
- (d) Download media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a download media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If download media is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any download media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear

understanding that the download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer.

### **Complaints about the Use of CCTV**

Any complaints in relation to the school's CCTV system should be addressed to the Headteacher.

### **Request for Access By The Data Subject**

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to Mrs J Owen School Business Manager

### **Public Information**

Copies of this policy will be available to the public from the school office.

## **Appendix 1**

### **Well Green Primary School**

#### **CCTV Privacy Notice**

##### **How we use CCTV data;**

We, Well Green Primary School, are a data controller for the purpose of the General Data Protection Regulation.

The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors. Surveillance will be used as a deterrent for violent behaviour and damage to the school.

Please be advised this notice covers the use of CCTV cameras, and does not cover any live feeds we may have throughout the school, as they do not record information.

Ensure the welfare of pupils, staff and visitors.

- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.
- The prevention, investigation and detection of crime.
- Monitoring the security of the site.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).

##### **The categories of visitor data we collect include;**

- Personal/ special categories of information such as;
  - Images and video footage of pupils, staff, parents and visitors

## **The lawful basis on which we use this information;**

### **Public Task;**

We process CCTV data in order to comply with our public task, namely to ensure that the security of our pupils, staff, buildings and their contents are maintained at all times.

The following information is processed as a result of the schools public task;

- Images and video footage of pupils, staff, parents and visitors

### **Identification;**

In areas where CCTV is used the school will ensure that there are prominent signs in place.

The signs will:

- Be clearly visible and readable.
- Be an appropriate size depending on context.

### **Storing digital images;**

Images captured by CCTV/Surveillance will not be kept for longer than is necessary.(14 days) However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

Neither the General Data Protection Act nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The school ensures that images are not retained for longer than is necessary. Once the retention period has expired, the images are removed or erased.

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator unless the monitor displays a scene which is in plain sight from the monitored location.

Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of pupils, staff or visitors.

The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk.

Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

## **Who we share visitor data with;**

We do not routinely share this information with any external organisations or third parties.

There may be circumstances in which we may lawfully share CCTV images with third parties where, for example, we are required to do so by law, by court order, or to prevent fraud or other crimes. Where we share data, however, we shall do so in accordance with applicable data protection laws.

We will not give information about you to anyone outside this establishment without your consent unless the law permits it.

## **Contact**

If you would like to discuss anything in this privacy notice, please contact:

Andrew Van Damms  
Information Governance  
Trafford Council  
Talbot Road  
Stretford  
M32 0TH