



Inspire Partnership Academy Trust

CCTV Policy



**WEST
THORNTON**
PRIMARY SCHOOL

Approved – July 2021

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1. Overview

1.1 West Thornton Primary School, part of the Inspire Partnership Academy Trust has in place a CCTV surveillance system, "the system" within internal and external areas of the school site. Images are monitored and recorded centrally and will be used in strict accordance with this policy. The system is owned by the Inspire Partnership Academy Trust.

1.2 The Headteacher has initial responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented. They may be contacted as follows:

Ms A New

office@inspirewestthornton.co.uk

Rosecourt Road, Croydon, Surrey, CR0 3BS

020 8684 3497

In the absence of the Headteacher this responsibility transfers to the Nominated Deputy. They may be contacted as follows:

Mrs D Callaghan

office@inspirewestthornton.co.uk

Rosecourt Road, Croydon, Surrey, CR0 3BS

020 8684 3497

General Data Protection Regulations: CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. This Policy is associated with the Inspire Partnership Academy Trust General Data Protection Policy, the provisions of which should be adhered to at all times.

2. The system

2.1 The system comprises: fixed position cameras, digital recorders and public information signs.

2.2 Cameras will be located at strategic points within the school site. No camera will be hidden from view. A list of locations is given at Appendix 1.

2.3 Signs will be prominently placed at strategic points and at entrance and exit points of the school site to inform staff, pupils, visitors, and members of the public that a CCTV installation is in use.

2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

3. Purpose of the system

3.1 The system has been installed with the primary purpose of reducing the threat of crime generally, protecting school premises and helping to ensure the safety of all staff, pupils, and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- Deter those having criminal intent or intent to abuse staff, pupils, or visitors physically or verbally.
- Assist in the prevention and detection of crime.
- Facilitate the identification, apprehension, and prosecution of offenders in relation to crime and public order.
- Support the school's statutory obligation to safeguard children.
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to managers and/or to a member of staff against whom disciplinary or other action is or is threatened to be taken.
- Facilitate the movement of vehicles on site.
- In the case of staff to provide management information relating to employee compliance with contracts of employment.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking

3.2 Covert recording

3.2.1 Covert cameras may be used under the following circumstances on the written authorisation or request of the DPO, CEO or COO and where it has been assessed re: General Data Protection Regulations by the DPO

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and

- That there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

- 3.2.2 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.
- 3.2.3 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

4. Monitoring of images

- 4.1 Images captured by the system will be recorded on a drive located in the premises office, twenty-four hours a day throughout the whole year. Monitors are sited in the school office and are not visible from outside the room.
- 4.2 No unauthorised access to the hard drive will be permitted at any time. Access will be strictly limited to those expressly authorised by the Headteacher/Associate Headteacher, police officers, premises team and any other person with statutory powers of entry. A list of those members of staff authorised to access the Control Room is given at Appendix 2.
- 4.3 Staff, guests and visitors may be granted access to the hard drive on a case-by-case basis and only then on written authorisation from the Headteacher/Associate Headteachers. In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason to enter the hard drive.
- 4.4 Before allowing access to the hard drive, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, located on the sign in screen in the main foyer which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the control room, this will also include any visitors granted emergency access.

5. Staff

- 5.1 All staff with authorised access to CCTV images will be made aware of the sensitivity of handling CCTV images and recordings. The Headteacher/ Associate Headteachers will ensure that all staff are fully

briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.

5.2 Training in the requirements of the General Data Protection Regulations will be given to all those required to work in the premises office.

6. Recording

6.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents may be recorded in real time.

6.2 Images will normally be retained for 3 months from the date of recording, and then automatically overwritten and the Log updated accordingly. Once a hard drive has reached the end of its use it will be erased prior to disposal and the Log will be updated accordingly.

6.3 All hard drives and recorders shall remain the property of the Inspire Partnership Academy Trust until disposal and destruction.

7. Access to images

7.1 All access to images will be recorded in an Access Log.

7.2 Access to images will be restricted to those staff who need to have access in accordance with the purposes of the system. A list of such staff is given at *Appendix 2*.

7.3 Access to images by third parties

7.3.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder.
- Prosecution agencies
- Relevant legal representatives
- The media where the assistance of the public is required in the identification of a victim of crime or the identification of a perpetrator of a crime.
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

7.4 Access to images by a subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.

- 7.4.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the DPO. Subject Access Request Forms are obtainable in hard copy from the school office. An electronic copy can be obtained via our [website](#). A response will be provided promptly and in any event within 1 month of receiving the request.
- 7.4.2 The General Data Protection Act gives the DPO the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
- 7.4.3 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 month, stating the reasons.

8. Complaints

- 8.1 It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to the Headteacher at office@inspirewestthornton.co.uk. Concerns or enquiries relating to the provisions of the General Data Protection Regulations and/or The Data Protection Act 2018 may also be addressed to the Trust CEO. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

9. Data breach

- 9.1 A "Personal Data Breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed".
- 9.2 In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the Incident Response Team (IRT), comprised of the Headteacher, Trust COO and the DPO, and the Trust Data Breach Policy must be followed.

- 9.3 Immediate steps will be taken to ensure that the breach is contained, and the effects of the breach minimised and mitigated as much as possible.
- 9.4 If the data breach is deemed by the IRT to be reportable to the Information Commissioner's Office, the ICO will be notified within 72 hours of the discovery of the breach.
- 9.5 In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

10. Compliance monitoring

- 10.1 The contact point for staff or members of the public wishing to enquire about the system will be the Headteacher, by prior appointment.
- 10.2 Upon request enquirers will be provided with:
- A summary of this statement of policy
 - An access request form if required or requested.
 - A subject access request form if required or requested.
 - A copy of the Inspire Partnership Academy Trust's complaints procedures.
- 10.3 All documented procedures will be kept under review and a report periodically made to senior management.
- 10.4 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.

Appendix 1

Camera No.	Location - RR	Type
1	The Alternative (Y5 Cypress Exit)	External. Fixed position inc Night Vision and zoom
2	The Alternative (Y3 Spruce Exit)	External. Fixed position inc Night Vision and zoom
3	The Alternative (Y1 Fir Exit)	External. Fixed position inc Night Vision and zoom
4	Fire exit outside dining hall leading to playground	External. Fixed position inc Night Vision and zoom
5	Fire exit outside main hall leading to playground	External. Fixed position inc Night Vision and zoom
6	Main entrance	External. Fixed position inc Night Vision and zoom
7	Main entrance - electric door	External. Fixed position inc Night Vision and zoom
8	Main entrance – car park	External. Fixed position inc Night Vision and zoom
9	Above Reception Class door	Internal. Fixed position inc Night Vision and zoom
10	Foyer	Internal. Fixed position inc Night Vision and zoom
11	Above kitchen	External. Fixed position inc Night Vision and zoom
Camera No.	Location - CR	Type
1	Main entrance	External. Fixed position inc Night Vision and zoom
2	Office	Internal. Fixed position inc Night Vision and zoom
3	Side entrance bottom of staircase A	External. Fixed position inc Night Vision and zoom

4	Side entrance bottom of staircase B	External. Fixed position inc Night Vision and zoom
5	Main playground - next to MUGA	External. Fixed position inc Night Vision and zoom
6	Main playground - next to MUGA	External. Fixed position inc Night Vision and zoom
7	Main playground - above Reception door	External. Fixed position inc Night Vision and zoom
8	Reception play area	External. Fixed position inc Night Vision and zoom
9	Kitchen	External. Fixed position inc Night Vision and zoom

Appendix 2

Name	Job Title/Role	Contact Details	Email
Marley Williams	Premises Manager	0208 684 3497	office@inspirewestthornton.co.uk
Yusuf Ghori	Premises Assistant	0208 684 3497	office@inspirewestthornton.co.uk
Liane Shepherd	Premises Assistant	0208 684 3497	office@inspirewestthornton.co.uk
Alex New	Headteacher	0208 684 3497	office@inspirewestthornton.co.uk
Donna Callaghan	Associate Headteacher	0208 684 3497	office@inspirewestthornton.co.uk
Jonathan Owen	Associate Headteacher	0208 684 3497	office@inspirewestthornton.co.uk
Stephen Schwartz	DPO	0208 684 3497	office@inspirewestthornton.co.uk