



KINGSBURY HIGH SCHOOL

CCTV Policy

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Committee: Resources Committee

Approved by: *Sandra Emery*
Chair of Resources Committee

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KINGSBURY HIGH SCHOOL

CCTV POLICY

1 Policy Statement

- 1.1 Kingsbury High School (the School) uses Close Circuit Television ("CCTV") within the premises of the School. The purpose of this policy is to set out the position of the School as to the management, operation and use of the CCTV system at the School.
- 1.2 This policy applies to all members of our Workforce, visitors to the School premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes effect on 25 May 2018 and 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 Kingsbury High School in relation to its use of CCTV.

2 Purpose of CCTV

- 2.1 The 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 the school buildings and 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 CCTV system has been installed on both the Princes Avenue and Bacon Lane sites of the School.



KINGSBURY HIGH SCHOOL

- 3.2 The system at Princes Avenue comprises 44 4MP VR Dome cameras installed inside the School buildings and 23 2MP AIR CCTV cameras installed externally on the School buildings. Images are recorded on 3 32 channel NVRs sited in the secure IT Network room.
- 3.3 The system at Bacon Lane comprises 43 4MP VR Dome cameras installed inside the School buildings and 31 2MP AIR CCTV cameras installed externally on the School buildings. Images are recorded on 3 32 channel NVRs sited in the secure IT Network room.
- 3.4 None of the cameras on the School sites have sound recording capability
- 3.5 All of the cameras on the School sites are fixed in their direction and can only be adjusted by redirecting manually with no electronic movement control.

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. The School will make all reasonable efforts to ensure that areas beyond the immediate environs of the 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 classrooms, 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 the School to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 The 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 the School.



KINGSBURY HIGH SCHOOL

- 6.2 On a day to day basis the CCTV system will be operated by the Head of Facilities.
- 6.3 The viewing of live CCTV images will be restricted to the following members of the Workforce:
- 6.3.1 members of SLT and the Head of Facilities have access to all cameras to ensure safety and security of every person on the site and the site itself,
 - 6.3.2 members of the Facilities team have access to all cameras for premises management, security of every person on the site and protection of School assets and buildings,
 - 6.3.3 Receptionists and members of the Human Resources team have access to external cameras to assist with admission of visitors, students and the Workforce as well as the internal cameras within the reception area for Workforce safety,
 - 6.3.4 Security Guards have access to external cameras only for premises security purposes and admission of visitors, students and the Workforce.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by the following members of the Workforce:
- 6.4.1 members of SLT and the Head of Facilities have access to images for all cameras for all matters to ensure the safety and security of every person on the sites and the sites themselves,
 - 6.4.2 members of the Student Development team have access to images for all cameras but only for student related matters,
 - 6.4.3 members of the Human Resources team have access to images for all cameras but only for Workforce related matters,
 - 6.4.4 members of the Facilities team have access to all cameras but only for premises security purposes, protection of School assets & buildings, identification of intruders and visitor related matters.
- 6.5 Live CCTV and recorded images may be viewed by members of the IT department only in relation to a request for technical support from a member of SLT to assist a person authorised under section 6.3 or 6.4 above respectively.



KINGSBURY HIGH SCHOOL

- 6.6 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.
- 6.7 Control of the right to view or access CCTV images will be by password. No member of the Workforce may share their password with any other person
- 6.8 Access of CCTV images will only be conducted while on School premises and no access will ever be conducted remotely while outside School premises
- 6.9 The CCTV system is checked daily by Head of Facilities or their designate in the Facilities team 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 maximum period of 21 days unless there is a specific purpose for which they are retained for a longer period.
- 7.3 The 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 are located in restricted access areas;
 - 7.3.2 The CCTV system is password protected;
 - 7.3.3 Restriction of the ability to make copies to specified members of staff, being the managers, or their designates, identified in section 8.3 below.
- 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 the managers identified in section 8.3 below and shared with the Head of Facilities.

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 School's Subject Access Request Policy.



KINGSBURY HIGH SCHOOL

- 8.3 When such a request is made the following individuals (dependent on the matter) will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request;
- 8.3.1 Student Matters: Student Development Manager or their designate in the Student Development team,
 - 8.3.2 Workforce Matters; Human Resources Manager or their designate in the Human Resources team,
 - 8.3.3 Visitor or Property Security Matters: Head of Facilities or their designate in the Facilities team,
 - 8.3.4 Any member of SLT in the absence of the above individuals.
- 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 individuals authorised in 8.3 above 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 the 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 by each of the managers listed in section 8.3 above, of all disclosures which sets out:
- 8.6.1 When the request was made;
 - 8.6.2 The process followed by the individual authorised in section 8.3 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



KINGSBURY HIGH SCHOOL

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 The 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 individuals authorised for particular matters under section 8.3 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 every 2 years.

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 the school should be made in accordance with the School Complaints Policy.



CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1 Who will be captured on CCTV?

Students, Workforce, parents / carers, volunteers, suppliers, contractors, customers, Governors and other visitors including members of the public

2 What personal data will be processed?

Facial Images, behaviour, actions

3 What are the purposes for operating the CCTV system? Set out the problem that Kingsbury High School is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

Safe and secure environment for students, Workforce & visitors, prevention of the loss or damage of Kingsbury High School buildings and assets, prevention or detection of crime

4 What is the lawful basis for operating the CCTV system?

Legal Obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime

5 Who is/are the named person(s) responsible for the operation of the system?

Head of Facilities

6 Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. siting of the cameras and why such locations were chosen;
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and



KINGSBURY HIGH SCHOOL

- e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

The CCTV cameras have been selected for providing good quality images at a reasonable price based on professional advice.
Cameras have been sited in locations agreed with SLT as being key areas of concern for student & workforce safety reasons and protection of school property
Cameras have been sited so as to only point within the school premises
Signs advising of the CCTV system are sited at all entrances to the school premises
The system does not allow for the blurring of details of third party individuals and manual methods would be needed to redact images of third parties.

- 7 Set out the details of any sharing with third parties, including processors

Police - in relation to prevention of crime and apprehending offenders
Data Subjects – in relation to Subject Access Requests

- 8 Set out the retention period of any recordings, including why those periods have been chosen

A maximum of 21 days has been selected as this provides sufficient time for a subject access request to be checked and approved even if it occurs during most school holidays (summer holidays being the exception).

- 9 Set out the security measures in place to ensure that recordings are captured and stored securely

Recordings of images are captured and stored on the School operated CCTV system, with no third party involvement of access. Images are stored on NVRs sited in the secure IT Network rooms on each school site, to which only the IT team have access. Access to images is restricted to staff set out in section 6. Access to live recording and recorded images is password protected.

- 10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- Is it fair to record them in the way proposed?
- How is the amount of data processed to be minimised?
- What are the risks of the system being accessed unlawfully?
- What are the potential data breach risks?



- What are the risks during any transfer of recordings, or when disclosed to third parties such as the police?

11 What measures are in place to address the risks identified?

Location and direction of CCTV cameras is regularly reviewed
There is a limitation of 21 days of data stored
Limitation of access is controlled by passwords issued to specified members of staff or departments authorised in section 6 of the policy
Data storage is solely on the School site and is physically held in the secure IT Network rooms
Images are stored on the secure IT Network which is protected from unauthorised access by firewalls on the school premises and operated by our internet provider (LGFL)
Strict transfer arrangements are in place with the police

12 Have parents and students where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

No consultation has taken place with parents and students due to the need for the system for the purposes set out in section 3 above

13 When will this privacy impact assessment be reviewed?

Earlier of July 2021 or installation of new CCTV system

Approval:

This assessment was approved by the Data Protection Officer:

DPO

Date