



CCTV DATA POLICY

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Introduction

Bramhall High School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings to provide a safe and secure environment for students, staff and visitors, and to prevent the loss of, or damage to, school property. As might be expected, this includes the protection and safeguarding of children, especially vulnerable children. Surveillance will be used as a deterrent.

We act as the data controller for the purpose of the General Data Protection Regulation. Bramhall High School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The number of authorised operators and employees with access to images is very tightly restricted. This includes Headteacher, Deputy Headteacher (Behaviour), Designated Safeguarding Lead, Heads of Year, Key Stage Coordinator (standards), Network Manager, Senior IT Technician and Site Manager.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school. All employees are aware of the restrictions in relation to access to and disclosure of recorded images.

Please be advised this policy 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.

We collect information to:

- Maintain a safe environment.
- 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 lawful basis on which we use this information is for:

Public Task:

We process CCTV data 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.

System Management

Access to the CCTV system and data shall be password protected using 2 stage multi factor authentication and encrypted as well as being kept in a secure area.

The CCTV system will be administered and managed by Network 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 Business Manager (Operations).

The system and the data collected will only be available to the Systems Manager, his/her replacement, the Site Manager and appropriate members of the senior leadership team and key pastoral staff as determined by the Headteacher. The detailed list is described above.

The CCTV system is designed to be in operation 24 hours each day, every day 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 that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned to best achieve the objectives set out in this policy by proving 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 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.

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. Images are kept for 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. Data storage is automatically overwritten by the system after a period of 28 days.

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 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.

If a CCTV camera has recorded a specific incident under investigation, recordings may be used in both student and staff investigatory and potentially disciplinary proceedings to provide evidence as appropriate.

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:

Business Operations Manager on 0161 439 8045

Data Protection Officer Email - IGschoolsupport@stockport.gov.uk

Telephone Number – 0161 474 4299