


## Elmsleigh Infant and Nursery School Security (CCTV) Policy

### Approval

<b>Signed by Head Teacher on behalf of the Governing Body</b>	
<b>Date of approval</b>	77/22-23 22 <sup>nd</sup> May 2023
<b>Date of review</b>	21 <sup>st</sup> May 2024

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Elmsleigh Infant and Nursery School uses closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how the Elmsleigh Infant and Nursery School uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

## **Legality**

There are two important points within the CCTV Code of Practice 2008 which are basic points of law that must be adhered to.

## **CCTV Signs**

CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located at the entrance gate, the building entrance and inside reception.

## **Registering the CCTV System**

The Elmsleigh Infant and Nursery registration number with the Information

Commissioners office is Z6158462.

## **The Data Protection Act 2018 and UK GDPR**

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is "Personal data" means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

The definition of Processing is much wider in its scope than the previous legislation )  
"Processing", in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as—

- (a) collection, recording, organisation, structuring or storage,
- (b) adaptation or alteration,
- (c) retrieval, consultation or use,
- (d) disclosure by transmission, dissemination or otherwise making available,
- (e) alignment or combination, or
- (f) restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

## **Purpose**

The CCTV recordings may be used for:

- prevention and detection of crimes, in the Elmsleigh Infant and Nursery School and on the premises
- student behaviour management, discipline and exclusions
- staff disciplinary and associated processes and appeals
- maintaining a safe environment for the whole school community

## **CCTV system operation**

The CCTV system will be operational 24 hours a day, 365 days a year.

The Data Controller is registered with the Information Commissioner's Office.

The system does not record audio.

All recordings will have date and time stamps.

## **Location of cameras**

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system. Appropriate signs are displayed around the Elmsleigh Infant and Nursery School premises within prominent locations that clearly identifies that CCTV recording is in operation.

Signs are located at the entrance gate, building entrance and playground gate.

## **General access to CCTV footage**

It will not be common practice to release CCTV footage unless satisfactory evidence for legal proceedings can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, the Elmsleigh Infant and Nursery School may allow authorised personnel to view footage where the above purposes are considered.

The Elmsleigh Infant and Nursery School will maintain a record of all disclosures.

All requests for access should be made in writing to the system manager Karen Burton, headteacher and be specific to a date and time frame (See appendix A)

Any disclosure will be done in line with UK GDPR and Data Protection.

The Elmsleigh Infant and Nursery School cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation.
- other identifiable individuals have not consented

## **Authorised CCTV system operators**

The Elmsleigh Infant and Nursery School has limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system.

The authorised personnel within Elmsleigh Infant and Nursery School are:

- Karen Burton, headteacher – system manager
- Ruth Samme, school business manager
- Elisha Flamson Communications and Office Co-ordinator

## **Storage of footage**

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will be 30 days. At the end of the retention period, the files will be automatically deleted.

On occasion footage may be retained for longer than 30 days. For example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

## **CCTV system security**

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will be checked for faults every 6 months
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary

## **Covert recording**

The Elmsleigh Infant and Nursery School will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity is taking place
- covert processing is carried out for limited and reasonable period of time and related to specific suspected criminal activity
- If the situation arises where the Elmsleigh Infant and Nursery School adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

## **Complaints**

Any complaints should be made in writing to the system manager:

- Karen Burton, Headteacher
- Email address: [headteacher@elmsleigh.derbyshire.sch.uk](mailto:headteacher@elmsleigh.derbyshire.sch.uk)

## **Security Electronic Fob System**

All staff are assigned an electronic security fob to access external and internal doors around school.

The purpose for this is to enhance safeguarding and ensure that only permitted persons are accessing areas of the school.

## **Visitors**

All visitors must report to the school office so that an appropriate member of staff can be contacted to escort them around the school.

Only authorised visitors will receive an electronic fob which will only access specific areas that are necessary to their visit.

## **Responsibilities**

It is the responsibility of the school office to arrange for visitors to receive an electronic fob as well as ensure that they are returned at the end of their visit.

Ruth Samme, School Business Manager  
Elisha Flamson, Communication and Office Co-ordinator

All fobs are programmed and maintained on the online software system that is operated by Ruth Samme, School Business Manager.

**Review and monitoring**

Appropriate changes will be made accordingly in line with changes to legislation.

The headteacher will communicate changes to all authorised staff members.

Scheduled review date is.

## APPENDIX A

### SUBJECT ACCESS REQUEST

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of:

Elmsleigh Infant and Nursery School

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting [www.ico.gov.uk](http://www.ico.gov.uk).

Elmsleigh Infant and Nursery School will maintain a log of access requests detailing who the requests have been made by.

#### Issuer of the above footage

Name	Signature	Date

#### Recipient of the above footage

Name	Signature	Date
Address		
Identification		