



THE NELSON THOMLINSON SCHOOL CLOSED CIRCUIT TELEVISION (CCTV) STATEMENT

Signed by Headmaster:

Signed by Co-Chair of Governors:

Reviewed by Curriculum Teaching and Learning Committee:

23 June 2022

Next review:

June 2023

1. Introduction

1.1 The purpose of this policy statement is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at NTS. It provides further detail in relation to the use of CCTV as outlined in the school's GDPR Policy. CCTV is in use to:

- increase personal safety of students, staff and visitors, and reduce the fear of crime
- monitor and minimise unauthorised and inappropriate vehicle access
- assist in managing the school
- protect the school buildings and their assets
- support the Police in a bid to deter and detect crime
- assist in identifying, apprehending and prosecuting offenders
- protect members of the public and private property

1.2 The system comprises of a number of fixed cameras.

1.3 The system does not have sound recording enabled.

1.4 The CCTV system is part of the electronic infrastructure of the building and is operated by the school, the deployment of which is determined by the school's SMT.

1.5 The CCTV is accessible only by certain key staff with responsibility for security or behaviour.

1.6 Any changes to CCTV monitoring will be subject to consultation with staff and the school community.

1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

1.8 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 data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.9 The school as data controller has responsibility for the control of images and deciding how the CCTV system is used. The school has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used.

2. Statement of Intent

2.1 The school complies with 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.

2.2 CCTV warning signs are prominently placed in external places close to school entrances.

2.3 The planning and design has endeavoured to ensure that the scheme 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.

3. Siting the Cameras

3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

3.2 The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

3.3 CCTV is not used in standard classrooms. Cameras are positioned on external buildings and security gates and within school corridors.

3.4 Members of staff have access to details of where CCTV cameras are situated.

5. Storage and Retention of CCTV images

5.1 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. The schools retains CCTV for a period of time which is variable, but not unlimited, based upon the nature of the area covered by certain cameras.

5.2 All retained data will be stored securely.

6. Access to CCTV images

6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7. Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves as outlined within the school's GDPR policy.

8. Access to and Disclosure of Images to Third Parties

8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

8.2 Requests for access should be made in writing to the data controller.

8.3 The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9. Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headmaster at the school.

9.2 If the issue remains unresolved, complainants should contact the Trust's Data Protection Officer using the school address or via email at: gdpr@nts.cumbria.sch.uk

9.3 If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioners Office, they are advised to contact the Information Commissioners Office via www.ico.org.uk.

Further Information

- Further information on CCTV and its use is available from the following:
- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018

Appendix A – CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

