



**Oldbury Wells School**  
**School Closed Circuit Television (CCTV)**  
**Statement**  
**January 2023**

<b>FREQUENCY OF REVIEW:</b>	Annually
<b>RATIFICATION DATE:</b>	
<b>RATIFIED BY:</b>	OWS Local Governing Body Autumn Term 2023
<b>DATE OF NEXT REVIEW:</b>	<i>(unless there is a material change)</i>
<b>AUTHOR:</b>	Asst. Headteacher for Behaviour & Learning, Pastoral Development and Cultural Ethos

Adopted by the Oldbury Wells School Local Governing Body

Signed ..... Chair of Local Governing Body      Dated .....

Signed ..... Headteacher      Dated .....

## **1. Introduction**

- 1.1 The purpose of this Policy is to regulate the review, management, operation, and use, of closed-circuit television (CCTV) at Oldbury Wells School. CCTV is in use to:
- increase the personal safety of students, staff, and visitors, and reduce the fear of crime
  - prevent crime and vandalism within school
  - monitor and minimise unauthorised and inappropriate vehicle access
  - assist in managing the school and behaviour across the school site to implement necessary action in line with school policy
  - investigate events of an incident involving pupils, staff, external groups, or the wider school community and take action as necessary in line with school policies
  - 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 located throughout the school site and grounds (internally and externally).
- 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 and the deployment of which is determined by the school's leadership team.
- 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 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. 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 and sound. All operators are trained 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 and sound.
- 1.9 The school's data controller has responsibility for the control of images and deciding how the CCTV system is used. The academy 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 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.
- 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 social areas and corridors. Some cameras are positioned in communal toilet space to mitigate crime and manage behaviour in this area. No cubicle or urinal area is covered by the CCTV where there would be a risk to the privacy for our students. In all areas, we ensure compliance with the CCTV Code of Practice and Data Protection Act.
- 3.4 Members of staff have access to details of where CCTV cameras are situated.

## **4. Storage and Retention of CCTV images**

- 4.1 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 school retains CCTV for a period of up to 21 days.
- 4.2 All retained data will be stored securely.

## **5. Access to CCTV images**

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

## **6. Subject Access Requests (SAR)**

- 6.1 Individuals have the right to request access to CCTV still images relating to themselves under the Data Protection Act.
- 6.2 All requests should be made in writing to the data controller. Individuals submitting requests for access will be asked to provide sufficient information to enable the still images relating to them to be identified, for example, date, time and location.

- 6.3 The school will respond to requests within 30 calendar days of receiving the written request and fee.
- 6.4 CCTV operators will need to ensure that the requester is present in the still images and that by supplying the still images they do not disclose any personal data of another data subject.
- 6.5 As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and the still images edited so that only the person requesting access can be identified. The school has software that enables parts of images to be blocked out, but if it is not possible to conceal the identity of others, disclosure is unlikely. Refusal to disclose images, even where parts of images have been blocked out, may be appropriate where its release is:
- Likely to cause substantial and unwarranted damage to an individual.
  - To prevent automated decisions from being taken in relation to an individual.
  - Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

Any decision to show still images would be made on an individual case by case basis (eg. to provide information to a disciplinary committee in school should an incident involving a student be clearly shown on CCTV).

## **7. Access to and Disclosure of Images to Third Parties**

- 7.1 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).
- 7.2 Requests for access should be made in writing to the data controller.
- 7.3 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.

## **8. Complaints**

- 8.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher at the school.
- 8.2 If the issue remains unresolved, complainants should contact the Trust's Data Controller using the school address or via email at: [robert.montgomery@telford.gov.uk](mailto:robert.montgomery@telford.gov.uk)
- 8.3 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](http://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](http://www.ico.org.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998

## Appendix A – CCTV Signage

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It is a requirement of the Data Protection Act 1998 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

An example of the signage displayed is below:

