



CCTV POLICY

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1. Overview

- 1.1 **Holmwood School** has in place a CCTV surveillance system, "the system" within *the internal and external site*. Images are monitored and recorded centrally and will be used in strict accordance with this policy. The system is owned by **Holmwood School**
- 1.2 The **Head Teacher** has initial responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented.

In the absence of [insert name above] this responsibility transfers to Deputy Head Teacher. They may be contacted as follows:

General Data Protection Regulations: CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. This Policy is associated with **Holmwood School's** General Data Protection Policy, the provisions of which should be adhered to at all times.

2. The System

- 2.1 The system comprises: ***fixed position cameras without sound and two fixed position cameras with sound.***
- 2.2 Cameras will be located at strategic points on the complex, no camera will be hidden from view.
- 2.3 Signs will be prominently placed at strategic points and at entrance and exit points of the complex to inform staff, visitors, and members of the public that a CCTV installation is in use.
- 2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

3. Purpose of the System

- 3.1 The system has been installed by **Holmwood School** with the primary purpose of reducing the threat of crime generally, protecting premises and helping to ensure the safety of all **Holmwood School** staff, pupils and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:-
- Deter those having criminal intent
 - Assist in the prevention and detection of crime
 - Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
 - Facilitate the identification of any activities/event.
 - Facilitate the movement of vehicles on site.

- In the case of staff to provide management information relating to employee compliance with contracts of employment.
- Following an incident to ensure procedures were followed
- Following an accident
- To investigate damage or an accident.
- For staff training on any incidents in school.

The system will not be used:-

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.

4. **Monitoring of Images**

- 4.1 Images captured by the system will be recorded twenty-four hours a day throughout the whole year. Monitors are not visible from outside the room.
- 4.2 No unauthorised access to **monitors** will be permitted at any time. Access will be strictly limited to **Head Teacher**, police officers and any other person with statutory powers of entry.
- 4.3 Staff, guests and visitors may be granted access to on a case-by-case basis and only the Head Teacher authorisation.

5. **Staff**

- 5.1 All staff working in **Holmwood School** will be made aware of the sensitivity of handling CCTV images and recordings. The DPO will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.
- 5.2 Training in the requirements of the General Data Protection Regulations will be given to all those required to work in **Holmwood School** by the DPO.

6. Recording

- 6.1 Incidents are recorded in real time.
- 6.2 Images will normally be retained for **14 days** from the date of recording, and then automatically overwritten and the Log updated accordingly. Once a hard drive has reached the end of its use it will be erased prior to disposal and the Log will be updated accordingly.
- 6.3 All hard drives and recorders shall remain the property of **Holmwood School** until disposal and destruction

7. Access to Images

- 7.1 All access to images will be recorded in an Access Log
- 7.2 Access to images will be restricted to Head Teacher, he may have with at least one other member of staff in accordance with the purposes of the system. At times the Head Teacher will solely access the video.
- 7.3 Access to images by third parties
- 7.3.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:-
- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
 - Prosecution agencies
 - Relevant legal representatives
 - The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
 - People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
 - Emergency services in connection with the investigation of an accident.
- 7.4 Access to images by a subject
- CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.
- 7.4.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the DPO. Subject Access Request Forms are obtainable in hard copy from the Head Teacher. A response will be provided promptly and in any event within 1 month of receiving the request.

8. Complaints

- 8.1 It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to the Head Teacher. Concerns or enquiries relating to the provisions of the General Data Protection Regulations and/or The Data Protection Act 2018 are to be addressed to the DPO. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

9. Data Breach

- 9.1 A “Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”.
- 9.2 In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the Incident Response Team (IRT), comprised of the DPO as well as **Head Teacher**
- 9.3 Immediate steps will be taken to ensure that the breach is contained and the effects of the breach minimised and mitigated as much as possible.
- 9.4 If the data breach is deemed by the IRT to be reportable to the Information Commissioner’s Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/>
- or
by telephone: **0303 123 1113**
- 9.5 In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

10. Compliance Monitoring

- 10.1 The contact point for staff or members of the public wishing to enquire about the system will be the DPO by pre-arranged appointment.
- 10.2 Upon request enquirers will be provided with:
- A summary of this statement of policy
 - An access request form if required or requested
 - A subject access request form if required or requested
 - A copy of **Holmwood School** complaints procedures
- 10.3 All documented procedures will be kept under review and a report periodically made to senior management.
- 10.4 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.